

Exhibit 15

June 27, 2022

STATE OF CONNECTICUT
SUPERIOR COURT
COMPLEX LITIGATION DOCKET
HELD AT WATERBURY
VOLUME III

- - - - -X

ERICA LAFFERTY, et al.,
PLAINTIFFS,

vs. X06-UWY-CV18-6046436-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

WILLIAM SHERLACH,
PLAINTIFF,

vs. X06-UWY-CV18-6046437-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

WILLIAM SHERLACH, et al.,
PLAINTIFFS,

vs. X06-UWY-CV18-6046438-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

V I D E O T A P E D D E P O S I T I O N

The videotaped deposition of BRITTANY PAZ
was taken pursuant to notice at the offices of Koskoff
Koskoff & Bieder, PC, 350 Fairfield Avenue, Bridgeport,
Connecticut, before Viktoria V. Stockmal, RMR, CRR,
license #00251, a Notary Public in and for the State of
Connecticut, on Monday, June 27, 2022, at 10:11 a.m.

June 27, 2022

<p style="text-align: right;">Page 549</p> <p>1 A P P E A R A N C E S:</p> <p>2 ATTORNEYS FOR THE PLAINTIFFS:</p> <p>3 KOSKOFF KOSKOFF & BIEDER, PC</p> <p>4 350 Fairfield Avenue</p> <p>5 Bridgeport, CT 06604</p> <p>6 Tel: 203-336-4421</p> <p>7 E-mail: asterling@koskoff.com</p> <p>8 cmattei@koskoff.com</p> <p>9 mblumenthal@koskoff.com</p> <p>10 CHRISTOPHER M. MATTEI, ESQ.</p> <p>11 ALINOR STERLING, ESQ. (Appearing remotely)</p> <p>12 PRITIKA SESHADRI</p> <p>13</p> <p>14 ATTORNEYS FOR THE DEFENDANTS:</p> <p>15</p> <p>16 FOR ALEX EMRIC JONES, INFOWARS, LLC, FREE SPEECH</p> <p>17 SYSTEMS, LLC, INFOWARS HEALTH, LLC and PRISON</p> <p>18 PLANET TV, LLC:</p> <p>19</p> <p>20 PATTIS & SMITH, LLC</p> <p>21 383 Orange Street, First Floor</p> <p>22 New Haven, CT 06511</p> <p>23 Tel: 203-393-3017</p> <p>24 E-mail: npattis@pattisandsmith.com</p> <p>25</p> <p>26 ZACHARY REILAND, ESQ.</p> <p>27</p> <p>28 FOR GENESIS COMMUNICATIONS NETWORK, INC.:</p> <p>29 BRIGNOLE, BUSH, & LEWIS, LLC</p> <p>30 73 Wadsworth Street</p> <p>31 Hartford, CT 06106</p> <p>32 Tel: 860-527-9973</p> <p>33 E-mail: mcerame@brignole.com</p> <p>34 MARIO KENNETH CERAME, ESQ. (Appearing remotely)</p> <p>35</p> <p>36 ALSO PRESENT:</p> <p>37 Joseph Raguso, Videographer</p>	<p style="text-align: right;">Page 551</p> <p>1 THE COURT REPORTER: Are you going to want</p> <p>2 me to re-swear the witness?</p> <p>3 MR. CERAME: I think we should.</p> <p>4 THE COURT REPORTER: Let me make sure I</p> <p>5 have everybody who is present. If everybody</p> <p>6 could identify yourselves.</p> <p>7 MR. MATTEI: Chris Mattei on behalf of the</p> <p>8 plaintiffs. On the Zoom, I am joined by my</p> <p>9 colleague, Alinor Sterling, also on behalf of</p> <p>10 the plaintiffs. She will be observing today.</p> <p>11 And then the other individual you see on the</p> <p>12 Zoom, Pritika Seshadri, is my assistant.</p> <p>13 MR. CERAME: This is Mario Cerame. I</p> <p>14 represent Genesis Communication Network</p> <p>15 Incorporated, a co-defendant to Alex Jones and</p> <p>16 the other co-defendants.</p> <p>17 MR. REILAND: In the room, Attorney</p> <p>18 Zachary Reiland for the Jones defendants with</p> <p>19 Ms. Paz.</p> <p>20 THE COURT REPORTER: Thank you.</p> <p>21 Transcript orders?</p> <p>22 MR. MATTEI: We just do an e-Tran.</p> <p>23 MR. CERAME: We didn't order one at this</p> <p>24 time.</p> <p>25 MR. REILAND: E-Tran is fine.</p>
<p style="text-align: right;">Page 550</p> <p>1 S T I P U L A T I O N S</p> <p>2</p> <p>3 IT IS HEREBY STIPULATED AND AGREED TO</p> <p>4 by and among counsel for the respective parties hereto</p> <p>5 that all technicalities as to the proof of the official</p> <p>6 character of the authority before whom the deposition is</p> <p>7 to be taken are waived.</p> <p>8</p> <p>9 IT IS FURTHER STIPULATED AND AGREED TO</p> <p>10 by and among counsel for the respective parties hereto</p> <p>11 that any objections to the sufficiency of the notice are</p> <p>12 waived.</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND AGREED TO</p> <p>15 by and among counsel for the respective parties hereto</p> <p>16 that all objections, except as to form and privilege, are</p> <p>17 reserved to the time of trial.</p> <p>18</p> <p>19 IT IS FURTHER STIPULATED AND AGREED TO</p> <p>20 by and among counsel for the respective parties hereto</p> <p>21 that the reading and the signing of the deposition by the</p> <p>22 deponent are NOT waived.</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 552</p> <p>1 THE VIDEOGRAPHER: We are now on the</p> <p>2 record.</p> <p>3 Participants should be aware that this</p> <p>4 proceeding is being recorded and as such, all</p> <p>5 conversations held will be recorded unless</p> <p>6 there's a request and agreement to go off the</p> <p>7 record. This is the video recorded deposition</p> <p>8 of Brittany Paz being taken by counsel.</p> <p>9 Today's Monday June 27th, 2022, the time</p> <p>10 now is 10:11 a.m. in the eastern time zone. We</p> <p>11 are here in the matter of Erica Lafferty versus</p> <p>12 Alex Jones.</p> <p>13 My name is Joe Raguso, videographer with</p> <p>14 U.S. Legal, located at 90 Broad Street, New</p> <p>15 York, New York. I am not related to any</p> <p>16 parties in this action nor am I financially</p> <p>17 interested in the outcome.</p> <p>18 At this time, will the reporter, Viktoria</p> <p>19 Stockmal on behalf of Legal Support, please</p> <p>20 swear in the witness.</p> <p>21 THE COURT REPORTER: Will counsel</p> <p>22 stipulate that I can swear the witness</p> <p>23 remotely?</p> <p>24 MR. MATTEI: Yes, counsel for the</p> <p>25 plaintiff agrees to the remote administration</p>

June 27, 2022

<p style="text-align: right;">Page 553</p> <p>1 of the oath and that this deposition will be</p> <p>2 conducted pursuant to that.</p> <p>3 MR. CERAME: Zach, you go.</p> <p>4 MR. REILAND: Attorney Zachary Reiland,</p> <p>5 present in the deposition room for the Jones</p> <p>6 defendants, agrees to the same, the witness may</p> <p>7 be sworn in.</p> <p>8 MR. CERAME: Attorney Mario Cerame. We</p> <p>9 stipulate to the same thing that both other</p> <p>10 counsel have.</p> <p>11</p> <p>12 B R I T T A N Y P A Z</p> <p>13 Business address: 4 Research Drive, Suite 402, Shelton</p> <p>14 Connecticut, 06484,</p> <p>15 Called as a witness, having been</p> <p>16 first duly sworn and/or affirmed by</p> <p>17 Viktoria V. Stockmal, a Notary Public in</p> <p>18 and for the State of Connecticut, was</p> <p>19 examined and testified as follows:</p> <p>20 THE COURT REPORTER: I failed to ask.</p> <p>21 Usual stipulations?</p> <p>22 MR. MATTEI: Yes. Yes, the usual</p> <p>23 stipulations apply. In this case that is meant</p> <p>24 that the witness has reserved her right to read</p> <p>25 and sign the deposition and that the parties</p>	<p style="text-align: right;">Page 555</p> <p>1 A Sure. After the last day of deposition, I went</p> <p>2 through the deposition notice that was going to be for</p> <p>3 today, but I think the day got moved because Mr. Jones</p> <p>4 took a date; and then I thought that I needed to speak to</p> <p>5 some more people on the rest of the questions; so, I</p> <p>6 spoke to Blake Roddy, who is in charge of the marketing</p> <p>7 and advertising for Free Speech and I also had a couple</p> <p>8 conversations with Bob Roe and Mark Schwartz, I think.</p> <p>9 They are the accountants that work with Free Speech about</p> <p>10 the financial aspects of it, and I took some notes about</p> <p>11 my conversations with them.</p> <p>12 Q So, in the first section here it looks like</p> <p>13 you've headed it Advertising and then you indicate --</p> <p>14 there's a notation, Blake Roddy interview, March 4, 2022.</p> <p>15 Am I to understand that for those first two paragraphs</p> <p>16 there before you get to Marketing Services, that that</p> <p>17 information was obtained from Mr. Roddy during an</p> <p>18 interview of him?</p> <p>19 A Right. I spoke to him on the phone and I think</p> <p>20 these are the notes that I took during that phone</p> <p>21 conversation.</p> <p>22 Q Did you take those -- did you type those notes</p> <p>23 at the time or were those handwritten notes that you</p> <p>24 transcribed?</p> <p>25 A Honestly, I don't remember if I typed them</p>
<p style="text-align: right;">Page 554</p> <p>1 are reserving all objections except those as to</p> <p>2 form until the time of trial.</p> <p>3 MR. REILAND: And yes for the Jones</p> <p>4 defendants in the room.</p> <p>5 MR. CERAME: Yes, for Attorney Cerame.</p> <p>6 EXAMINATION BY MR. MATTEI:</p> <p>7 Q Good morning, Ms. Paz.</p> <p>8 A Good morning.</p> <p>9 Q Welcome back. We were last here for your</p> <p>10 deposition on, I believe --</p> <p>11 A Back in March.</p> <p>12 Q -- March 16th. And so, before we start today,</p> <p>13 I observed that you had a set of typewritten notes before</p> <p>14 you. You've handed me a copy of those and these will be</p> <p>15 marked as the next exhibit in sequence. I don't know if</p> <p>16 we know what that will be right now or if we can just do</p> <p>17 that at the break.</p> <p>18 MS. SESHADRI: 126.</p> <p>19 (Plaintiff's Exhibit 126 was</p> <p>20 marked for identification: Typewritten</p> <p>21 notes.)</p> <p>22 BY MR. MATTEI:</p> <p>23 Q This will be Exhibit 126.</p> <p>24 Ms. Paz, why don't you just explain to me what</p> <p>25 these notes are?</p>	<p style="text-align: right;">Page 556</p> <p>1 directly. I might have typed them directly because I was</p> <p>2 in front of my computer at the time, so I don't know if I</p> <p>3 hand wrote anything.</p> <p>4 Q The Marketing Services since 2017, was that</p> <p>5 also information you obtained from Mr. Roddy during that</p> <p>6 interview?</p> <p>7 A Post -- I think post-2018, because he wasn't in</p> <p>8 that position prior to that. So, I don't know -- I don't</p> <p>9 think he could really give me any information pre-2018</p> <p>10 when he was in that position, which is what my notes</p> <p>11 indicate is that other people were doing that.</p> <p>12 Q I just want to confirm for now that the</p> <p>13 itemized list, one, two, three here, that's all</p> <p>14 information you obtained from Mr. Roddy; right?</p> <p>15 A Yes.</p> <p>16 Q What you are saying is that information</p> <p>17 pertains to post-2017 business activity; correct?</p> <p>18 A Right. That's what it says there.</p> <p>19 Q And then, you have here a header that says</p> <p>20 Blake Roddy Deposition; what does that indicate?</p> <p>21 A That after I had spoken to Blake, I reviewed</p> <p>22 his deposition.</p> <p>23 Q That was the deposition that he gave in this</p> <p>24 case; correct?</p> <p>25 A Yes, I believe it was in this case, Connecticut</p>

June 27, 2022

<p style="text-align: right;">Page 557</p> <p>1 cases.</p> <p>2 Q So, everything down until the part that says</p> <p>3 Notes dash, that was all information that you obtained</p> <p>4 either by virtue of your interview with Mr. Roddy or your</p> <p>5 review of his deposition; correct?</p> <p>6 A Yes.</p> <p>7 Q Then you get to notes at the bottom which</p> <p>8 starts with "to notes" and I'm assuming this refers to</p> <p>9 the documents that were produced last week purporting to</p> <p>10 be some sort of debt instrument between Free Speech</p> <p>11 Systems and PQPR; correct?</p> <p>12 A That is correct, yes.</p> <p>13 Q Where did you obtain the information reflected</p> <p>14 here at the very bottom?</p> <p>15 A These are based on a couple conversations I</p> <p>16 had. I had a video conversation with Mark Schwartz and</p> <p>17 counsel. I also had, I believe, one video conference</p> <p>18 with Bob Roe and maybe two phone calls basically</p> <p>19 explaining the spreadsheets that I believe were produced</p> <p>20 as well as the notes.</p> <p>21 Q When did your conversation with Mr. Schwartz</p> <p>22 and counsel take place?</p> <p>23 A Within the last couple weeks after we scheduled</p> <p>24 this date. So, within the last couple weeks.</p> <p>25 Q Was it last week?</p>	<p style="text-align: right;">Page 559</p> <p>1 17th?</p> <p>2 Q Okay.</p> <p>3 And that's a Zoom call involving you, a</p> <p>4 gentleman named Mark Schwartz and Attorney Pattis?</p> <p>5 A It was Attorney Reiland.</p> <p>6 Q Thank you.</p> <p>7 Anybody else participate in that?</p> <p>8 A No, it was just the three of us.</p> <p>9 Q What's your understanding of who Mr. Schwartz</p> <p>10 is?</p> <p>11 A I believe he's an accountant working for Free</p> <p>12 Speech.</p> <p>13 Q Okay.</p> <p>14 Where did you get that information?</p> <p>15 A Attorney Pattis indicated he was the best</p> <p>16 person to speak to regarding the financial questions that</p> <p>17 were going to be in this deposition; so, that is who I</p> <p>18 contacted.</p> <p>19 Q Okay.</p> <p>20 The financial questions, you're referring</p> <p>21 specifically to the relationship between PQPR and Free</p> <p>22 Speech Systems?</p> <p>23 A The questions that were noticed in the</p> <p>24 deposition, those questions.</p> <p>25 Q What specific financial issues did you believe</p>
<p style="text-align: right;">Page 558</p> <p>1 A It might have been the week before.</p> <p>2 Q Okay.</p> <p>3 Is that your best recollection that it was</p> <p>4 probably a week before?</p> <p>5 A Yeah, I don't remember the exact date of when</p> <p>6 the conversation happened, but it was after this date was</p> <p>7 scheduled and we knew that this date was happening.</p> <p>8 Q Well, this date's been scheduled for quite a</p> <p>9 while, so I just want to make sure I understand what your</p> <p>10 best recollection is of when your conversation with</p> <p>11 Mr. Schwartz and counsel may have taken place.</p> <p>12 A Well, I wasn't --</p> <p>13 Q Let me just finish.</p> <p>14 A Oh, sure.</p> <p>15 Q So, you indicated earlier that you thought it</p> <p>16 was within the last couple of weeks. So, today is June</p> <p>17 27th. Do you believe it was during the week beginning</p> <p>18 June -- Sunday, June 12th?</p> <p>19 A May I look at my calendar?</p> <p>20 Q Yeah, please. Would that be a calendar entry?</p> <p>21 A I might have put it in my calendar because it</p> <p>22 was a Zoom call, so it might be in my calendar.</p> <p>23 Q That would be great.</p> <p>24 A Just give me one second.</p> <p>25 So, I have it on my calendar as Friday, June</p>	<p style="text-align: right;">Page 560</p> <p>1 he was going to be able to provide you information --</p> <p>2 A He was going to be able to explain to me, for</p> <p>3 example, one of the noticed questions was about</p> <p>4 advertising. Who advertises, paid advertising to Free</p> <p>5 Speech who -- and how we get paid for advertising. So,</p> <p>6 he was able to pull information from our general ledger</p> <p>7 and create some spreadsheets and then he explained those</p> <p>8 to me. For example, one of the questions was questions</p> <p>9 about Mr. Jones' compensation, he created a spreadsheet,</p> <p>10 we had a conversation about the information that was in</p> <p>11 there so I can cogently testify to it today. That kind</p> <p>12 of thing.</p> <p>13 Q You're referring to Mark Schwartz as having</p> <p>14 been the individual who --</p> <p>15 A I had --</p> <p>16 Q Just let me finish my question.</p> <p>17 A Okay, sure.</p> <p>18 Q You collected that information and was in the</p> <p>19 best position to talk about those issues on behalf of</p> <p>20 Free Speech Systems?</p> <p>21 A I had also spoken to Mr. Roe about that</p> <p>22 previously.</p> <p>23 Q I'm just specifically though talking about</p> <p>24 Mr. Schwartz and the meeting you had with him on June</p> <p>25 17th and what you were informed about his status with the</p>

June 27, 2022

<p style="text-align: right;">Page 561</p> <p>1 company, why he was in the position to give you</p> <p>2 information concerning those issues. I just want to make</p> <p>3 clear that you're speaking specifically about</p> <p>4 Mr. Schwartz there being the one who collected</p> <p>5 spreadsheets concerning Mr. Jones's compensation and</p> <p>6 spreadsheets and information concerning advertising</p> <p>7 activity of Free Speech Systems; is that correct?</p> <p>8 A I don't know how to answer that question. I</p> <p>9 don't know if he created those spreadsheets. All I know</p> <p>10 is he was able to explain the spreadsheets to me.</p> <p>11 Q Those spreadsheets being the ones related to</p> <p>12 Free Speech Systems' advertising and to Mr. Jones's</p> <p>13 compensation?</p> <p>14 A If you would like to pull up the deposition</p> <p>15 notice, I could indicate exactly which numbers I spoke to</p> <p>16 him about.</p> <p>17 Q No, no, I'm asking you about the spreadsheets</p> <p>18 you were just voluntarily testifying about. So, I don't</p> <p>19 want to present you -- I'm asking --</p> <p>20 A Well, you asked me a question.</p> <p>21 Q Just let me finish, Ms. Paz.</p> <p>22 A Sure.</p> <p>23 Q We have to do question and answer. It's going</p> <p>24 to go a lot quicker if you just let me finish my question</p> <p>25 and then you answer; okay?</p>	<p style="text-align: right;">Page 563</p> <p>1 I'm not sure, so he was able to explain them to me.</p> <p>2 Q Mr. Schwartz was?</p> <p>3 A Yes.</p> <p>4 Q And one of the spreadsheets Mr. Schwartz was</p> <p>5 able to explain to you pertained to the information</p> <p>6 described in item 4, third-party advertising services;</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q Okay. Continue.</p> <p>10 A Then for No. 5, any third parties who had paid</p> <p>11 Free Speech for advertising and our marketing service.</p> <p>12 Q Mr. Schwartz described and explained those --</p> <p>13 the information contained in those spreadsheets?</p> <p>14 A Yes.</p> <p>15 Then for No. 8, the compensation to Mr. Jones,</p> <p>16 David Jones and Kelly Jones?</p> <p>17 Q Mr. Schwartz explained that data to you?</p> <p>18 A Yes. We discussed that one.</p> <p>19 We also discussed No. 9 which is the closed</p> <p>20 caption transcription services.</p> <p>21 Q Mr. Schwartz -- Mr. Schwartz was able to</p> <p>22 provide you with information concerning Free Speech</p> <p>23 System's closed captioning services?</p> <p>24 A Yes. So, I asked him -- that wasn't originally</p> <p>25 included in the information, but he was able to go</p>
<p style="text-align: right;">Page 562</p> <p>1 Specifically, the spreadsheets that you were</p> <p>2 referring to that Mr. Schwartz described for you and was</p> <p>3 able to explain, you referred to them as being</p> <p>4 spreadsheets relating to Mr. Jones's compensation and</p> <p>5 advertising; is that correct?</p> <p>6 A Yes. Among others.</p> <p>7 Q Okay, great.</p> <p>8 What other issues did he explain to you?</p> <p>9 A If you would pull up the deposition notice, I</p> <p>10 could tell you exactly which ones.</p> <p>11 Q Why don't we pull up the re-notice for today.</p> <p>12 Do you have that in front of you, Ms. Paz?</p> <p>13 A Yes.</p> <p>14 Q So, you would like us just to advance to the</p> <p>15 topic section?</p> <p>16 A Yes, that would be great.</p> <p>17 If you could scroll down just a little bit</p> <p>18 more. Wait, wait, wait. Too far, too far.</p> <p>19 So, if you scroll up to No. 4. So, one of</p> <p>20 those spreadsheets was the identities of any third</p> <p>21 parties who provide with you marketing service. So, they</p> <p>22 were able to -- when I say "they," I mean, Mark Schwartz</p> <p>23 and Mr. Roe. I'm not sure --</p> <p>24 Q I'm asking you specifically about Mr. Schwartz?</p> <p>25 A I don't know who created those spreadsheets,</p>	<p style="text-align: right;">Page 564</p> <p>1 through the general ledger and search for the information</p> <p>2 and then provide that. So, he may have created that</p> <p>3 spreadsheet because I asked him directly for it.</p> <p>4 Q You asked Mr. Schwartz directly for what now?</p> <p>5 A spreadsheet describing expenses made for closed</p> <p>6 captioning transcription services?</p> <p>7 A Right.</p> <p>8 Q He was able to provide that for you?</p> <p>9 A Right. Well, it was -- it's not difficult.</p> <p>10 You go through the general ledger and just search for</p> <p>11 that account. So, it has a specific account associated</p> <p>12 with it and then he just printed off all of the</p> <p>13 transactions for that time period.</p> <p>14 Q Okay.</p> <p>15 A We did discuss item 10, the transactions</p> <p>16 between the two companies, Free Speech and PQPR. And if</p> <p>17 you could scroll down -- I just want to make sure I have</p> <p>18 everything. I think that's it.</p> <p>19 Q And so, Mr. Schwartz was described to you as an</p> <p>20 accountant working for Free Speech Systems?</p> <p>21 A Yes, I don't know exactly what his relationship</p> <p>22 is to Free Speech. It may be a consulting relationship,</p> <p>23 I'm not sure. But I was given his information and told</p> <p>24 to contact him.</p> <p>25 Q But I just want to make sure that what you</p>

June 27, 2022

<p style="text-align: right;">Page 565</p> <p>1 understand is that he is an accountant who is -- has some</p> <p>2 relationship with Free Speech Systems, it sounds like you</p> <p>3 believe in a consulting capacity?</p> <p>4 A I don't know what capacity he's employed by</p> <p>5 Free Speech, but that was the name of the person I was</p> <p>6 told to contact, so I did.</p> <p>7 Q And so, let me then just confirm that what you</p> <p>8 were informed was that he was an accountant?</p> <p>9 A I believe he's an accountant, yes.</p> <p>10 Q Based on information that Attorney Pattis</p> <p>11 provided to you?</p> <p>12 A Yes.</p> <p>13 Q Do you have any understanding of Mr. Schwartz's</p> <p>14 involvement in Mr. Jones's recent bankruptcy petition on</p> <p>15 behalf of three companies that he controls?</p> <p>16 A No, I don't.</p> <p>17 Q Were you aware that he was involved in that at</p> <p>18 all?</p> <p>19 A No, I'm not.</p> <p>20 Q Did he -- okay.</p> <p>21 How long was that meeting with Mr. Schwartz?</p> <p>22 A I would say it was about an hour.</p> <p>23 Q Let's pull up the two notes that were produced</p> <p>24 to us last week.</p> <p>25 These are -- what are these numbered?</p>	<p style="text-align: right;">Page 567</p> <p>1 documents with him. But I did discuss the debt with him.</p> <p>2 Q Understood.</p> <p>3 How did you first receive these two</p> <p>4 documents?</p> <p>5 A I asked for them and they were e-mailed to me.</p> <p>6 Q When were they e-mailed to you?</p> <p>7 A In the last week.</p> <p>8 Q Who e-mailed them to you?</p> <p>9 A I think Mr. Roe e-mailed them to me.</p> <p>10 MR. MATTEI: I don't believe that we have</p> <p>11 that e-mail, Zach. I don't think it was</p> <p>12 included in what you provided last week.</p> <p>13 MR. REILAND: That was probably sent after</p> <p>14 that disclosure was gathered together, so we'll</p> <p>15 start a new one.</p> <p>16 BY MR. MATTEI:</p> <p>17 Q So, you asked to see them and you asked --</p> <p>18 A I asked for them, yes.</p> <p>19 Q You believe Mr. Roe sent them to you last week?</p> <p>20 A Yes.</p> <p>21 Q Mr. Roe sent them to you last week --</p> <p>22 A Well, within the last week. I'm not sure.</p> <p>23 Within the last week.</p> <p>24 Q So, when did you discuss them with</p> <p>25 Mr. Schwartz?</p>
<p style="text-align: right;">Page 566</p> <p>1 MS. SESHADRI: 117 and 118.</p> <p>2 BY MR. MATTEI:</p> <p>3 Q Ms. Paz, do you have before you a document</p> <p>4 captioned Promissory Note, dated August 13, 2020?</p> <p>5 A Yes.</p> <p>6 Q Have you seen this document before?</p> <p>7 A Yes.</p> <p>8 Q Did you discuss this document with</p> <p>9 Mr. Schwartz?</p> <p>10 A Yes. We did discuss the two notes and their</p> <p>11 relationship to the payments that Free Speech makes to</p> <p>12 PQPR.</p> <p>13 Q Let's look at 18, too, if you can just identify</p> <p>14 that, Ms. Paz. This is another document captioned as a</p> <p>15 Promissory Note, dated November 10, 2021. Have you seen</p> <p>16 this document before?</p> <p>17 A Yes.</p> <p>18 Q Did you discuss this with Mr. Schwartz?</p> <p>19 A Yes.</p> <p>20 Q Did you discuss both these document with</p> <p>21 Mr. Roe as well?</p> <p>22 A Yes. I had had communications with Mr. Roe</p> <p>23 about the promissory -- the debt from Free Speech to</p> <p>24 PQPR. I hadn't seen these, though, when I had those</p> <p>25 conversations with him, so I didn't discuss the actual</p>	<p style="text-align: right;">Page 568</p> <p>1 A I had a phone call with Mr. Schwartz after the</p> <p>2 Zoom meeting.</p> <p>3 Q Okay.</p> <p>4 So, in addition to your Zoom meeting, you had a</p> <p>5 phone call with him and that was last week?</p> <p>6 A Well, yes. It had to be last week because</p> <p>7 today is Monday; so, yes.</p> <p>8 Q The purpose of that phone call specifically was</p> <p>9 to discuss these two documents?</p> <p>10 A Yes, discuss the notes and any other questions</p> <p>11 I had that were lingering, which weren't many. It was a</p> <p>12 short phone call.</p> <p>13 Q But you were aware during your initial</p> <p>14 conversation with Mr. Schwartz on the 17th of the</p> <p>15 existence of these notes which is what prompted you to</p> <p>16 then ask him for them?</p> <p>17 A Right.</p> <p>18 Q We'll go over these in substance a little bit</p> <p>19 later.</p> <p>20 So, your notes at the very bottom, I take it</p> <p>21 those notes are taken from your conversation with</p> <p>22 Mr. Schwartz concerning the actual documents; correct?</p> <p>23 A Right. So, these notes I didn't have the</p> <p>24 actual document yet, we were talking about it in our Zoom</p> <p>25 call. So, these were the notes from the Zoom call.</p>

June 27, 2022

<p style="text-align: right;">Page 569</p> <p>1 Q I see.</p> <p>2 And then do you have any notes that you took</p> <p>3 from your telephonic conversation with him last week?</p> <p>4 A No, I didn't write anything down. It was a</p> <p>5 very short conversation. It wasn't that long. Maybe,</p> <p>6 ten minutes.</p> <p>7 Q Okay.</p> <p>8 And your testimony is that you believe that you</p> <p>9 took these notes as kind of a running Word document. You</p> <p>10 had the notes from Mr. Roddy and then you continued to</p> <p>11 fill in the document --</p> <p>12 A Right.</p> <p>13 Q -- with your notes from Mr. Schwartz; correct?</p> <p>14 A That's correct, yes.</p> <p>15 Q The only notes you took during your Zoom call</p> <p>16 with Mr. Schwartz are those at the bottom; correct?</p> <p>17 A I believe so, yes. I don't have any -- I don't</p> <p>18 think I have any handwritten notes.</p> <p>19 Q Okay.</p> <p>20 Other than speaking with Mr. Roddy, reviewing</p> <p>21 Mr. Roddy's deposition and having a series of Zoom or</p> <p>22 telephone calls with both Mr. Roe and Mr. Schwartz, did</p> <p>23 you do anything else to prepare for your deposition</p> <p>24 today?</p> <p>25 A I don't believe so. I might have tried to</p>	<p style="text-align: right;">Page 571</p> <p>1 testimony?</p> <p>2 A No.</p> <p>3 Q And you haven't reviewed Rob Dew's deposition</p> <p>4 testimony?</p> <p>5 A No.</p> <p>6 Q Has anybody summarized or described Mr. Jones's</p> <p>7 testimony to you in any way?</p> <p>8 A His most recent deposition?</p> <p>9 Q He --</p> <p>10 A The one he was here in March for?</p> <p>11 Q He was here in March, he sat for two days in</p> <p>12 March and then he appeared virtually two weeks ago.</p> <p>13 A Okay.</p> <p>14 I don't have copies of those, no.</p> <p>15 Q But my question was whether anybody had</p> <p>16 summarized his testimony to you?</p> <p>17 A No.</p> <p>18 Q Okay.</p> <p>19 So, as far as -- you have no basis of</p> <p>20 information for understanding what he testified about in</p> <p>21 the Connecticut case; correct?</p> <p>22 A No, I haven't read them.</p> <p>23 Q I know you haven't read them, but I just want</p> <p>24 to --</p> <p>25 A No, no. No one talked to me about them either,</p>
<p style="text-align: right;">Page 570</p> <p>1 refresh my recollection from some of the previous</p> <p>2 depositions, but aside from that, no.</p> <p>3 Q Okay.</p> <p>4 Well, do you believe that you reviewed</p> <p>5 deposition transcripts, other than Mr. Roddy's, in</p> <p>6 advance of your deposition today?</p> <p>7 A I know I went -- over the weekend, I wanted to</p> <p>8 refresh my recollection from Mr. Daniel's deposition.</p> <p>9 Other than that, I don't think I read anything else other</p> <p>10 than these notes.</p> <p>11 Q You reviewed Mr. Daniel's deposition this</p> <p>12 weekend?</p> <p>13 A Yes, yes.</p> <p>14 Q Do you know he had basically two segments of</p> <p>15 his deposition? Do you know if you read his first, his</p> <p>16 second, both?</p> <p>17 A It wasn't -- so, I know that he was also</p> <p>18 deposed in Texas. I don't have a copy of that. So, I</p> <p>19 think I only have a copy of his Connecticut deposition.</p> <p>20 So, I re-read that.</p> <p>21 Q That's what I'm referring to. He sat twice in</p> <p>22 Connecticut?</p> <p>23 A Oh, I see. No, no. I only have one portion of</p> <p>24 it. I don't think I have a second portion.</p> <p>25 Q You didn't review Alex Jones's deposition</p>	<p style="text-align: right;">Page 572</p> <p>1 so, no.</p> <p>2 Q Thank you.</p> <p>3 When we were last here, you testified that you</p> <p>4 had been paid \$30,000 for all of your work as Free Speech</p> <p>5 Systems' corporate representative both in Texas and in</p> <p>6 Connecticut. Have you received any compensation since we</p> <p>7 last met for your deposition?</p> <p>8 A Have I received anything, no, but I do</p> <p>9 anticipate receiving an additional flat rate.</p> <p>10 Q Okay.</p> <p>11 And how did that -- and how much do you</p> <p>12 anticipate receiving in addition to the \$30,000 you've</p> <p>13 already been paid?</p> <p>14 A The agreement was, because we needed to have</p> <p>15 these additional days of deposition, I don't think that</p> <p>16 was contemplated that I would receive a flat \$7,500 fee.</p> <p>17 Q And that's specifically for your testimony</p> <p>18 today?</p> <p>19 A Right.</p> <p>20 Q You don't anticipate giving any other</p> <p>21 deposition testimony either here or in Texas; correct?</p> <p>22 A Unless you need another day, but I don't think</p> <p>23 so.</p> <p>24 Q I think we will be finished today.</p> <p>25 A Okay.</p>

June 27, 2022

<p style="text-align: right;">Page 573</p> <p>1 Q Although I can't speak for Attorney Cerame, I</p> <p>2 think we will be finished today?</p> <p>3 A Yes, for however long this takes.</p> <p>4 Q May I ask, do you anticipate being available to</p> <p>5 testify at trial in any of the Texas cases?</p> <p>6 A If it's required, then yes.</p> <p>7 Q That's something you would be willing to do?</p> <p>8 A If it's required, yes. I think I have to.</p> <p>9 Q Okay.</p> <p>10 The same would be true if called to testify in</p> <p>11 Connecticut in the trial here; right?</p> <p>12 A Sure.</p> <p>13 Q You expect you would probably negotiate</p> <p>14 additional compensation for that work?</p> <p>15 A I don't know. We hadn't talked about it, in</p> <p>16 all honesty.</p> <p>17 Q You have not yet been paid the \$7,500 you are</p> <p>18 anticipating being paid for today.</p> <p>19 A Right. I don't have it yet. But I did invoice</p> <p>20 it.</p> <p>21 Q You invoiced it by e-mail?</p> <p>22 A Yes, I did.</p> <p>23 Q And am I correct that you still don't have any</p> <p>24 sort of written agreement or retainer with Attorney</p> <p>25 Pattis or Free Speech Systems?</p>	<p style="text-align: right;">Page 575</p> <p>1 Q You're aware that storable food is sold on</p> <p>2 websites owned by Free Speech Systems?</p> <p>3 A I don't know.</p> <p>4 Q You testified a moment ago that PQPR sells</p> <p>5 products on Free Speech Systems' websites. Which</p> <p>6 websites?</p> <p>7 A I believe that they're sold on InfoWars.com.</p> <p>8 There are ads that link to -- link back to the PQPR</p> <p>9 website from InfoWars. It may also link from Prison</p> <p>10 Planet. So we have ads that link back to the PQPR</p> <p>11 website so that people can purchase from that site.</p> <p>12 Q When you say "we have ads," what ads are you</p> <p>13 talking about? You're talking about Free Speech Systems</p> <p>14 runs ads on InfoWars.com?</p> <p>15 A No, PQPR has these ads, but we, as in our</p> <p>16 website, InfoWars, hosts these ads that link back to</p> <p>17 PQPR's website to purchase the products.</p> <p>18 Q Okay.</p> <p>19 So, Free Speech Systems' testimony is that PQPR</p> <p>20 places advertisements on InfoWars.com; correct?</p> <p>21 A I believe so, yes.</p> <p>22 Q Free Speech Systems owns InfoWars.com; correct?</p> <p>23 A Free Speech owns InfoWars.com, yes.</p> <p>24 Q And the advertisements, I think you were just</p> <p>25 describing, link back to a different website other than</p>
<p style="text-align: right;">Page 574</p> <p>1 A No, I don't think I signed a retainer</p> <p>2 agreement.</p> <p>3 Q Let's bring up the PQPR Free Speech Systems'</p> <p>4 transaction spreadsheet, please.</p> <p>5 I'm going to bring it up just so we have it;</p> <p>6 but let me ask you first: You're obviously familiar with</p> <p>7 the company PQPR Holdings Limited LLC; correct?</p> <p>8 A Yes, I'm aware of it.</p> <p>9 Q What's your understanding of that company's</p> <p>10 purpose?</p> <p>11 A That company exists to purchase product which</p> <p>12 is then sold on the Free Speech website. It also houses</p> <p>13 the product. So, it basically -- it is -- it sells</p> <p>14 product is its purpose.</p> <p>15 Q And the products it sells are nutritional</p> <p>16 supplements; correct?</p> <p>17 A Yes, amongst others.</p> <p>18 Q Storable food?</p> <p>19 A I'm not sure about the storable food. I don't</p> <p>20 know, is the answer.</p> <p>21 Q Merchandise?</p> <p>22 A Yes.</p> <p>23 Q Did you ask anybody whether or not storable</p> <p>24 food is among the products sold by PQPR?</p> <p>25 A No.</p>	<p style="text-align: right;">Page 576</p> <p>1 InfoWars.com; correct?</p> <p>2 A It links to the PQPR's website so that the</p> <p>3 purchases can be made through PQPR.</p> <p>4 Q Which website is that?</p> <p>5 A I'm sorry, I don't know the name of the</p> <p>6 website. I'm not sure.</p> <p>7 Q Okay.</p> <p>8 Is it Free Speech Systems' testimony that PQPR</p> <p>9 owns the websites on which PQPR products are sold?</p> <p>10 A I don't know who owns the websites.</p> <p>11 Q Okay.</p> <p>12 So, I'll represent to you that infowarsshop.com</p> <p>13 is a website. Do you know whether Free Speech Systems</p> <p>14 owns it?</p> <p>15 A I'm not sure, to be honest.</p> <p>16 So, PQPR --</p> <p>17 Q Wait a second. There's no question pending.</p> <p>18 Infowarsshop.com is a website. Do you know if</p> <p>19 Free Speech Systems owns it?</p> <p>20 A I'm not sure.</p> <p>21 Q Are you aware the website freeworldoutlet.com?</p> <p>22 A No.</p> <p>23 Q So, Free Speech Systems isn't prepared to</p> <p>24 testify today concerning any relationship it may have</p> <p>25 with the website freeworldoutlet.com; right?</p>

June 27, 2022

<p style="text-align: right;">Page 577</p> <p>1 A Right.</p> <p>2 Q And Free Speech Systems isn't prepared to</p> <p>3 testify today concerning any relationship it has with the</p> <p>4 website preparetoday.com; correct?</p> <p>5 A Correct. I don't know that website.</p> <p>6 Q And Free Speech Systems is not prepared to</p> <p>7 testify today concerning any relationship it has with the</p> <p>8 website preparewithalex.com; correct?</p> <p>9 A Right. I don't know that website.</p> <p>10 Q Is Free Speech Systems -- well, although Free</p> <p>11 Speech Systems cannot testify as to whether it owns</p> <p>12 infowarsstore.com, infowarsshop.com, Free Speech Systems</p> <p>13 is aware that sales of PQPR products are transacted over</p> <p>14 those websites; correct?</p> <p>15 A Yes.</p> <p>16 Q And the -- during the time period 2012 through</p> <p>17 2020, proceeds from sales transacted over those websites</p> <p>18 were processed by Free Speech Systems not PQPR; correct?</p> <p>19 A No, I don't know that.</p> <p>20 Q Okay.</p> <p>21 So, Free Speech Systems' testimony is it does</p> <p>22 not know whether it was responsible for transacting the</p> <p>23 sales conducted on those websites; correct?</p> <p>24 A No, I don't think, I don't know, I think that</p> <p>25 PQPR transacts -- handles those transactions.</p>	<p style="text-align: right;">Page 579</p> <p>1 are handled through PQPR and Free Speech is given credits</p> <p>2 for certain things, such as advertising and stuff on Free</p> <p>3 Speech websites; but ultimately, PQPR is handling those</p> <p>4 transactions.</p> <p>5 Q That's not what I asked.</p> <p>6 And I'm going to ask you what you mean by</p> <p>7 handling transactions, but what I asked what was for the</p> <p>8 period 2012 to 2020, on the websites infowarsstore.com</p> <p>9 and infowarsshop.com, where did the proceeds for those</p> <p>10 sales go?</p> <p>11 A So, the proceeds from the sales are handled</p> <p>12 through PQPR. So, PQPR would have -- I'm sorry, I guess</p> <p>13 I'm getting confused by the question. So, all of the</p> <p>14 product sales and the products are sold --</p> <p>15 Q Well --</p> <p>16 A Through PQPR.</p> <p>17 Q You're confused by the question?</p> <p>18 A I'm confused by the question.</p> <p>19 Q Okay.</p> <p>20 So, when a sale happens on any of those</p> <p>21 websites; right?</p> <p>22 A Right.</p> <p>23 Q A customer pays money; right?</p> <p>24 A Yes.</p> <p>25 Q They authorize, for example, their credit card</p>
<p style="text-align: right;">Page 578</p> <p>1 Q Okay.</p> <p>2 A So, no, that's not correct.</p> <p>3 Q So, Free Speech Systems' testimony is that PQPR</p> <p>4 conducts the transactions -- the sales transactions over</p> <p>5 InfoWars.com -- I'm sorry. Strike that. Let me begin</p> <p>6 again.</p> <p>7 Your testimony is that PQPR conducts the</p> <p>8 transactions occurring over infowarsstore.com and</p> <p>9 infowarsshop.com for the period 2012 through 2020?</p> <p>10 MR. REILAND: I'll object to the form. I</p> <p>11 think she said she didn't make the --</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't understand -- yeah, I don't understand</p> <p>14 the question.</p> <p>15 Q Okay.</p> <p>16 A I'm sorry, can you just repeat it.</p> <p>17 Q Sure.</p> <p>18 You testified that there are sales transactions</p> <p>19 that occur on in for infowarsstore.com and</p> <p>20 infowarsshop.com; right?</p> <p>21 A Right.</p> <p>22 Q When those sales occur during 2012 to 2020,</p> <p>23 where were the sales proceeds routed?</p> <p>24 A So, PQPR handles all of the product sales. If</p> <p>25 you look at the spreadsheets, all of the product sales</p>	<p style="text-align: right;">Page 580</p> <p>1 to send money to a payee correct?</p> <p>2 A Mm-hm.</p> <p>3 Q That money presumably gets routed into an</p> <p>4 account; correct?</p> <p>5 A Sure.</p> <p>6 Q So, my question is: Who controlled the</p> <p>7 accounts to which those sale proceeds were routed for the</p> <p>8 websites infowarsshop.com and infowarsstore.com during</p> <p>9 the period of time 2012 to 2002?</p> <p>10 A I just want to make sure that I'm answering</p> <p>11 this correctly.</p> <p>12 Q Are you looking at something on your screen?</p> <p>13 A Well, you have the summary of the intercompany</p> <p>14 transactions up here.</p> <p>15 Q Okay.</p> <p>16 A And it's helpful to understanding the answer to</p> <p>17 your question.</p> <p>18 So, these are inter -- this is Exhibit 106</p> <p>19 that's up here if you have to up there. So, these are</p> <p>20 how all of the payments get applied. So, these -- in</p> <p>21 this second column, these credits, when I was talking</p> <p>22 about advertising fulfillment, administration and net</p> <p>23 credits, these are credits that Free Speech doesn't have</p> <p>24 to pay to PQPR. These product sales are debits. So,</p> <p>25 these are the sales that PQPR -- so, the end balance is</p>

June 27, 2022

<p style="text-align: right;">Page 581</p> <p>1 the money that Free Speech owes to PQPR because PQPR is</p> <p>2 handling the fulfillment; and then we have to pay PQPR</p> <p>3 for the cost of the products.</p> <p>4 Q Ms. Paz --</p> <p>5 A But if the question is where is the money going</p> <p>6 initially when the customer pays it, I don't know by</p> <p>7 looking at this spreadsheet. We would to have look at</p> <p>8 another spreadsheet.</p> <p>9 Q Let's take the spreadsheet down. I'm going to</p> <p>10 ask you questions about that spreadsheet. Okay. Right</p> <p>11 now I'm just asking about sale proceeds on</p> <p>12 infowarsstore.com and infowarsshop.com.</p> <p>13 All I'm asking is during the period 2012 to</p> <p>14 2002 where were those proceeds routed? Were they routed</p> <p>15 to any account controlled by Free Speech Systems or were</p> <p>16 they routed directly to accounts controlled by PQPR or</p> <p>17 were they routed somewhere else or does Free Speech</p> <p>18 Systems not know?</p> <p>19 A I don't know by looking at that spreadsheet and</p> <p>20 I don't have any independent recollection of it.</p> <p>21 Q Okay.</p> <p>22 So, I just want to be clear here. Free Speech</p> <p>23 Systems' testimony is that it does not know where the</p> <p>24 sale proceeds from transactions conducted over</p> <p>25 infowarsstore.com and infowarsshop.com went once those</p>	<p style="text-align: right;">Page 583</p> <p>1 websites, infowarsstore.com and infowarsshop.com, during</p> <p>2 the period 2012 to 2019 [Verbatim], were any Free Speech</p> <p>3 Systems' employees involved in processing those</p> <p>4 transactions?</p> <p>5 A No, PQPR processes the transactions, so they</p> <p>6 are PQPR employees.</p> <p>7 Q How many people does PQPR employ?</p> <p>8 A I don't know.</p> <p>9 Q Are any Free Speech Systems' employees, during</p> <p>10 the time period 2012 through 2020, involved in any</p> <p>11 activities on behalf of PQPR?</p> <p>12 A I'm sorry, can you repeat the question.</p> <p>13 Q Yeah.</p> <p>14 For the time period 2012 through 2020, were any</p> <p>15 Free Speech Systems' employees engaged in any activities</p> <p>16 on behalf of PQPR?</p> <p>17 A I don't know. I don't know how to answer that</p> <p>18 question. I don't know.</p> <p>19 Q Okay.</p> <p>20 Well, let me ask it this way then: You</p> <p>21 testified earlier that PQPR handles all transactions of</p> <p>22 its products, sales; correct?</p> <p>23 A Right, it does all the fulfillment of the</p> <p>24 order, it houses all of the products and it, you know,</p> <p>25 generally just fulfills all of the orders.</p>
<p style="text-align: right;">Page 582</p> <p>1 sales were executed for the period 2012 to 2020;</p> <p>2 correct?</p> <p>3 A I think my answer is I don't recall. I would</p> <p>4 to have look at another spreadsheet.</p> <p>5 Q Here's the problem, we dealt with this last</p> <p>6 time with Judge Bellis and Judge Bellis said quite</p> <p>7 clearly that I don't recall is not an acceptable answer.</p> <p>8 The answer is either Free Speech Systems, as it sits here</p> <p>9 today, either knows a fact or it does not know a fact.</p> <p>10 That's it.</p> <p>11 So, as you sit here today, Free Speech Systems,</p> <p>12 can you testify under oath as to whether or not sale</p> <p>13 transaction conducted over infowarsstore.com and</p> <p>14 infowarsshop.com between the period 2012 and 2020 were</p> <p>15 routed to accounts controlled by Free Speech Systems?</p> <p>16 A I don't know.</p> <p>17 Q Thank you.</p> <p>18 I think your testimony is Free Speech Systems</p> <p>19 doesn't even know who owned those websites during that</p> <p>20 period of time; correct?</p> <p>21 A I don't know. I'm not sure who owns them.</p> <p>22 Q All right. "You" being Free Speech Systems?</p> <p>23 A Yes.</p> <p>24 Q Thank you.</p> <p>25 With respect to transactions over those two</p>	<p style="text-align: right;">Page 584</p> <p>1 Q Okay. All right.</p> <p>2 So, let's break that down. So, you say that</p> <p>3 PQPR handles all the fulfillment of its -- did you say</p> <p>4 products?</p> <p>5 A Right, all the products that it sells and are</p> <p>6 linked back from the website, from the Free Speech's</p> <p>7 website via ads to the store. It has a staff, it has a</p> <p>8 warehouse. They package everything. They house it.</p> <p>9 They fulfill the orders. I did tour the warehouse, so</p> <p>10 they have a whole process about how that happens. And</p> <p>11 PQPR handles that.</p> <p>12 Q Okay. So --</p> <p>13 A It's --</p> <p>14 Q Free Speech Systems' testimony is that when it</p> <p>15 comes to the sale of PQPR products, PQPR owns the</p> <p>16 warehouse where those products are stored; correct?</p> <p>17 A I don't know if it owns it or rents it or</p> <p>18 leases it. I don't know.</p> <p>19 Q Okay.</p> <p>20 PQPR staff, by which I assume mean employees,</p> <p>21 handle the fulfillment of all those orders; correct?</p> <p>22 A That's correct.</p> <p>23 Q And PQPR employees handle all the accounting</p> <p>24 for PQPR's books and records; is that right?</p> <p>25 A I mean, I don't know how they do their internal</p>

June 27, 2022

Page 585

1 things. I don't represent PQPR. So, however they do
 2 that her internal business, I don't know.
 3 Q Okay.
 4 But Free Speech Systems' employees don't
 5 fulfill that function for PQPR, that is the accounting
 6 function?
 7 A Right. They have -- It's separate. They are
 8 two separate entities.
 9 Q And so, on the fulfillment piece, I take it
 10 that your testimony is that that involves receiving
 11 notice of any sale of a PQPR product, pulling that
 12 product for shipment, shipping it; anything else?
 13 A I mean, like I said, I don't know how their
 14 internal operations work there. I mean, I did tour the
 15 warehouse. They showed me how they stock everything.
 16 They showed me how they pulled an item, how it was
 17 labeled then for packaging. And then where it was
 18 ultimately shipped out. Aside from that, their internal
 19 processes, I don't know. I know they have some software
 20 that helps them with that. I don't know the name of it.
 21 I don't know how it works.
 22 Q Basically, anything that goes into fulfilling
 23 an order once it has been made by a customer, PQPR
 24 employees handle; correct?
 25 A Right.

Page 586

1 Q Free Speech Systems' employees do not?
 2 A Correct.
 3 Q Who gave you a tour of the warehouse?
 4 A I went with Attorney Blott when he was down in
 5 Austin.
 6 Q Okay.
 7 And she's outside counsel retained by Free
 8 Speech Systems to represent them in Texas; correct?
 9 A Right. Although I don't know if she's involved
 10 any longer, but she was when I was there and so she and I
 11 went.
 12 Q Who were the PQPR employees who showed you kind
 13 of the fulfillment process that you were just describing?
 14 A You know what, I'm so sorry, I don't remember
 15 their name. I don't remember.
 16 Q Okay. Okay.
 17 And it's your understanding that PQPR, whether
 18 it owns or leases the warehouse, pays for that facility
 19 in order to use that facility; correct?
 20 A I would assume so.
 21 Q Free Speech Systems does not?
 22 A I don't know. I don't represent PQPR, so I
 23 don't know what they do to handle their warehouse.
 24 Q Okay.
 25 Free Speech Systems, though, has no involvement

Page 587

1 in --
 2 A That's correct.
 3 Q -- sorry, just let me finish.
 4 Free Speech Systems has no involvement in
 5 paying for or managing that warehouse operation;
 6 correct?
 7 A Right.
 8 Q And the information that you had just been
 9 testifying to about PQPR -- PQPR's activities as distinct
 10 from Free Speech Systems was who?
 11 A I'm sorry, who told me that they were distinct?
 12 Q Not just distinct, but who informed you that
 13 PQPR employees and resources are responsible for the
 14 fulfillment and administrative activities of PQPR as
 15 opposed to Free Speech Systems' employees?
 16 A I think that would be based on my conversations
 17 with Mr. Jones, with Mr. Roe while I was down there, my
 18 conversations with counsel which I'm not going to go
 19 into. I think that would form the basis of that.
 20 Q What, specifically, did Mr. Jones tell you
 21 about PQPR?
 22 A That Free Speech and PQPR are separate and that
 23 they are -- they handle essentially the product sales and
 24 he is engaged in the function of being on air. So, in
 25 his mind, his business is being on the air.

Page 588

1 Q So, he described them to you as being distinct
 2 entities and that PQPR was involved in product sales.
 3 Did he say anything about the extent to which Free Speech
 4 Systems' employees are involved in any of PQPR's business
 5 activities?
 6 A We didn't talk about that like that.
 7 Q The warehouse that you toured, it was in
 8 Austin?
 9 A I think it was in Austin. It was very close
 10 by. It wasn't that far. It was maybe a ten minute ride
 11 from where Free Speech is housed. It wasn't that far.
 12 Q When you say Free Speech is housed, do you mean
 13 the studio operation?
 14 A Right. We drove there and it was a very quick
 15 ride.
 16 Q You and Attorney Blott drove there?
 17 A Right.
 18 Q What time of day did you go?
 19 A It was during business hours. It might have
 20 been right before lunch because I remember we were
 21 talking about where to eat after that, so it probably
 22 would have been right before lunch.
 23 Q Can you ballpark for me how many employees you
 24 observed while you were there?
 25 A So, there was a person who showed us around who

June 27, 2022

<p style="text-align: right;">Page 589</p> <p>1 I'm not really sure what their function was; but may have 2 been a manager. And then there were probably about maybe 3 4 to 6 people packaging mail for, you know, all the 4 product for delivery. So, taking, pulling up the order, 5 printing all the labels, pulling them from the shelves 6 and then putting them in for packaging. So, maybe a half 7 dozen people when I was there. It was a week day, around 8 lunch time.</p> <p>9 Q Okay. All right.</p> <p>10 And it's Free Speech Systems' testimony that 11 those are all PQPR employees?</p> <p>12 A Right.</p> <p>13 Q Even though you can't remember who they were?</p> <p>14 A The man who showed us around introduced 15 himself, but I do not remember his name for the life of 16 me. But I did not meet the people who were packaging the 17 materials. I didn't introduce myself, they didn't 18 introduce themselves. I don't know their names.</p> <p>19 Q If I said the name, do you think you would 20 remember it?</p> <p>21 A You could try and --</p> <p>22 Q Chris Ellison?</p> <p>23 A No.</p> <p>24 Q It wasn't Tim Fruge?</p> <p>25 A No, it wasn't Tim.</p>	<p style="text-align: right;">Page 591</p> <p>1 financial records you reviewed?</p> <p>2 A Right. But also, when I spoke to Mr. Roe and 3 Mr. Schwartz, everybody was very clear about the 4 relationship. The relationship is they fulfill the 5 product, we pay them for the product. Nowhere in those 6 conversations was we rent the space for them or we 7 purchase the space for them or -- and I haven't seen 8 anything in our transactions to indicate that. So from 9 where I sit, I don't see anything that would indicate 10 that we have any interest in the warehouse, itself. And 11 I don't know how they get the space. That's PQPR's realm 12 on how they get the space.</p> <p>13 Q Okay.</p> <p>14 So -- who told you that PQPR has its own 15 employees that manage the fulfillment and administrative 16 activities you were describing earlier?</p> <p>17 A I think I had a specific conversation with 18 Mr. Roe about that, about the fulfillment aspect and how 19 all of those employees are employed directly by PQPR.</p> <p>20 Q Okay.</p> <p>21 And is it your understanding that PQPR has -- 22 had its own employee work force since it was formed in 23 order to maintain that distinction between Free Speech 24 Systems and PQPR?</p> <p>25 A I would assume. So, I -- like I said, I don't</p>
<p style="text-align: right;">Page 590</p> <p>1 Q It wasn't Blake Roddy?</p> <p>2 A No, I met Blake. It wasn't Blake.</p> <p>3 Q Okay.</p> <p>4 Who told that you the warehouse -- I know you 5 testified that you don't know whether PQPR owns the 6 warehouse or rents that space. Who told you that Free 7 Speech Systems doesn't have any interest in that 8 warehouse?</p> <p>9 A What do you mean doesn't have an interest in 10 the warehouse? You mean we don't pay for it?</p> <p>11 Q Doesn't pay for it or doesn't have any 12 ownership of that facility?</p> <p>13 A I don't know that anybody told me that. I 14 mean, I see -- have seen all of the transactions between 15 the two companies and what they're for. I don't recall 16 seeing any transactions for rent or rental space. PQPR 17 bills us for product and, as you see, sometimes Free 18 Speech pays, sometimes they don't. But I don't see 19 anything in those documents to indicate that there is 20 some type of ownership interest in the warehouse.</p> <p>21 Q Okay.</p> <p>22 So, I take it from your testimony that what 23 you're saying is if, in fact, Free Speech Systems was 24 either paying rent or had some ownership interest in that 25 warehouse, you would have expected to see it in the</p>	<p style="text-align: right;">Page 592</p> <p>1 represent PQPR, so I really can't say how they manage 2 their employees or when or when people get hired. I 3 mean, I would assume so. They're separate entities.</p> <p>4 Q Well, you were required to be prepared to 5 testify about the relationship between Free Speech 6 Systems and PQPR?</p> <p>7 A Right, but I can't testify to the inner 8 workings of PQPR.</p> <p>9 Q I'm just asking about -- I'm asking about their 10 employee work force and I'm asking you whether you've 11 been informed that since PQPR was formed and started 12 doing business with Free Speech Systems, PQPR has had its 13 own employee work force to manage the PQPR business?</p> <p>14 A I don't know. I think so, but I'm not -- I 15 don't know.</p> <p>16 Q Okay.</p> <p>17 A I'm not sure.</p> <p>18 Q You think somebody told you that?</p> <p>19 A I don't -- I don't think I had a specific 20 conversation with anybody about when and how long they've 21 been employing people and in what capacity; because, like 22 I said, that wasn't in my purview. So -- but the 23 intention has always been to have them be separate. As 24 you could see from the finances, that wasn't always what 25 actually happened. So, I don't want to say definitively</p>

June 27, 2022

<p style="text-align: right;">Page 593</p> <p>1 that there wasn't any crossover between employees;</p> <p>2 because I'm not sure. And I didn't ask that specific</p> <p>3 question about whether in 2012, ten years ago, maybe,</p> <p>4 free Speech employees were at PQPR. I just don't know,</p> <p>5 so I don't want to mislead you and say I know when I</p> <p>6 don't.</p> <p>7 Is that clear?</p> <p>8 Q It is except now I want to want to go back to</p> <p>9 your earlier testimony. I take it your testimony</p> <p>10 concerning the fact that PQPR employees now run all PQPR</p> <p>11 business activities has to do with how -- the current</p> <p>12 situation at PQPR?</p> <p>13 A Well, no. I mean, I don't think it's just the</p> <p>14 current situation. I mean, obviously the financial</p> <p>15 situations currently there have been efforts made to make</p> <p>16 sure that they're more separate, there's more delineated</p> <p>17 payments between the two, everything is a little bit</p> <p>18 more, you know, accounting-wise, up to speed. But as far</p> <p>19 as the process goes, you know, the relationship between</p> <p>20 the employees there, I'm just not sure. And I don't</p> <p>21 think it's something that's recent that's happened; so I</p> <p>22 don't think that's correct. But I just don't want to say</p> <p>23 that going back ten years whether any Free Speech</p> <p>24 employees have never been employed at PQPR. I just don't</p> <p>25 know the answer to that.</p>	<p style="text-align: right;">Page 595</p> <p>1 best to do so.</p> <p>2 Q You've testified about this in Texas; correct?</p> <p>3 A I did, yes.</p> <p>4 Q And when was PQPR formed, approximately? You</p> <p>5 don't need to give me a specific date?</p> <p>6 A You know what, I don't recall.</p> <p>7 Q Okay.</p> <p>8 One of the reasons obviously that you're</p> <p>9 required to testify about this is because you're here to</p> <p>10 testify in part about Mr. Jones's compensation;</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q And when -- just give me one second.</p> <p>14 When PQPR was first formed, Mr. Jones exercised</p> <p>15 a controlling interest in it through another corporate</p> <p>16 entity; correct?</p> <p>17 A Yes.</p> <p>18 Q And what was that corporate entity called?</p> <p>19 A I think it's called PLJR. Like you said,</p> <p>20 alphabet soup. So, I believe PLJR has a 80 percent</p> <p>21 interest in PQPR. PLJR is then owned by the AEJ Trust --</p> <p>22 Q Hold on a second.</p> <p>23 A You want --</p> <p>24 Q The AEJ Trust came on later; right?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 594</p> <p>1 Q So, at least -- I mean, is Free Speech Systems</p> <p>2 prepared to say that, at least as of the initiation of</p> <p>3 this lawsuit, the fulfillment that PQPR's maintained it's</p> <p>4 own employee work force for the purpose of fulfilling all</p> <p>5 of PQPR business activities?</p> <p>6 A Right. They have their own employees. I think</p> <p>7 they always -- they've had their own employees. I just</p> <p>8 don't want to say whether or not there's been people</p> <p>9 working at PQPR who've also worked for Free Speech. I</p> <p>10 just don't know the answer to that. But they do maintain</p> <p>11 their own work force. Yes.</p> <p>12 Q Okay. So -- and I totally understand that.</p> <p>13 There might be somebody who, at one point, worked for</p> <p>14 Free Speech Systems and then works for PQPR. But fair</p> <p>15 to say that if somebody is working for PQPR they are</p> <p>16 employed there; correct?</p> <p>17 A Right.</p> <p>18 Q And that has been the case as far as you know</p> <p>19 going back until --</p> <p>20 A As far as I'm aware, yes.</p> <p>21 Q I would like to talk about PQPR ownership;</p> <p>22 okay?</p> <p>23 A If I can help you with that --</p> <p>24 Q There's an alphabet soup.</p> <p>25 A Yes. If I can help you there, I will do my</p>	<p style="text-align: right;">Page 596</p> <p>1 Q So, let's just start when it was formed; okay?</p> <p>2 And I think that you're on the right track.</p> <p>3 A There is a flowchart which I think you have</p> <p>4 which makes that easier to understand.</p> <p>5 Q I don't know if we have that. I have seen it.</p> <p>6 I believe that it was produced in Texas. It's possible</p> <p>7 we have it. But I'm not going to -- maybe Zach can find</p> <p>8 it at the break and --</p> <p>9 THE WITNESS: If you don't have it, I have</p> <p>10 it, I'm pretty sure.</p> <p>11 MR. MATTEI: Can you bring up the UHY</p> <p>12 Valuation, please.</p> <p>13 BY MR. MATTEI:</p> <p>14 Q I don't remember if I showed you this last</p> <p>15 time, Ms. Paz, but there's a valuation that was done, I</p> <p>16 believe in -- I don't want it guess. 2014?</p> <p>17 A I don't think I saw it last time.</p> <p>18 Q Are you familiar with this document, a UHY</p> <p>19 Valuation of Free Speech Systems and PLJR? No? Okay?</p> <p>20 A Oh, is this it?</p> <p>21 Q Why don't we go ahead and advance to -- you'll</p> <p>22 see a little table listing some -- no. Keep going.</p> <p>23 So, you see there the valuation in 2014</p> <p>24 indicates that PQPR holdings began in September of 2013;</p> <p>25 do you see that?</p>

June 27, 2022

<p style="text-align: right;">Page 597</p> <p>1 A I see that, yes.</p> <p>2 Q And at the time, PLJR holdings LLC held an 80</p> <p>3 percent ownership interest in PQPR; correct?</p> <p>4 A That's what it says, yes.</p> <p>5 Q And that's --</p> <p>6 A That's still the case today. Yes.</p> <p>7 Q And at the time PLJR holdings was owned 90</p> <p>8 percent by Alex Jones; correct?</p> <p>9 A At the time of this?</p> <p>10 Q Yes.</p> <p>11 A That's what it says. I've never seen this</p> <p>12 document before, but --</p> <p>13 Q Putting aside the document, I was doing this to</p> <p>14 kind of help you --</p> <p>15 A Orient me to the time? I appreciate it, yes.</p> <p>16 Q So, you know that when PQPR was formed, Alex --</p> <p>17 80 percent of it was owned by PLJR holdings and Alex</p> <p>18 Jones held a 90 percent interest in PLJR correct?</p> <p>19 A Yes.</p> <p>20 Q Thank you.</p> <p>21 And that continued with that structure for how</p> <p>22 long?</p> <p>23 A I believe it was until some time in 2018, which</p> <p>24 I think that there were some restructuring and some</p> <p>25 estate planning on Mr. Jones's part. And so, he did some</p>	<p style="text-align: right;">Page 599</p> <p>1 of conversations or documents you've reviewed as</p> <p>2 corporate designee; okay. So, I know that you spoke</p> <p>3 about this with Mr. Jones; right?</p> <p>4 A Yes.</p> <p>5 Q What did Alex Jones tell about the purpose of</p> <p>6 the AEJ Trust that was formed in 2018?</p> <p>7 A That the purpose of it was estate planning for</p> <p>8 the purpose of his children going forward. So he put, as</p> <p>9 I said, some body -- some principal into the trust so</p> <p>10 that it is for the benefit of your beneficiaries. So,</p> <p>11 that was the purpose of it.</p> <p>12 Q How was the AEJ 2018 Trust funded?</p> <p>13 A So, the AEJ Trust is funded, I believe the note</p> <p>14 is in the trust, so --</p> <p>15 Q Hang on a second --</p> <p>16 A Or one of the notes or maybe both of notes are</p> <p>17 in the trust.</p> <p>18 Q Just a second. To be clear, you are referring</p> <p>19 to Exhibits 117 and 118 we looked at earlier; correct?</p> <p>20 A Right.</p> <p>21 Q Both of those post date 2018; correct? There's</p> <p>22 an August 2020 note and a November 2021 note; right?</p> <p>23 A Right, but those are the dates of the actual</p> <p>24 transactions. Given my notes --</p> <p>25 Q Hang on just a second.</p>
<p style="text-align: right;">Page 598</p> <p>1 estate planning in 2018. So, probably about five years</p> <p>2 after or four years after that.</p> <p>3 Q So, in 2018, the ownership structure of PQPR</p> <p>4 changed; correct?</p> <p>5 A I think that's when the trust was formulated;</p> <p>6 so yes.</p> <p>7 Q Which trust are you referring to?</p> <p>8 A I think it's AEJ 2018 Trust.</p> <p>9 Q AEJ 2018 Trust?</p> <p>10 A I believe that's what it's called, yes.</p> <p>11 Q What was the purpose of that trust?</p> <p>12 A Estate planning on Mr. Jones's part.</p> <p>13 Q But what do you mean estate planning? What do</p> <p>14 you mean by that?</p> <p>15 A I mean, he created a trust for the benefit of</p> <p>16 his children as remaindermen and so, you put -- when you</p> <p>17 formulate any trust -- I mean, I'm not an estate planning</p> <p>18 attorney, but I took trusts and estates in law school.</p> <p>19 You put --</p> <p>20 Q Hold on a second, I'm not -- I don't want you</p> <p>21 to get into --</p> <p>22 A Okay, go ahead.</p> <p>23 Q -- your law school training.</p> <p>24 A Go ahead.</p> <p>25 Q I want to know what you understand as a result</p>	<p style="text-align: right;">Page 600</p> <p>1 A Sure.</p> <p>2 Q Those notes were not in existence in 2018 when</p> <p>3 the trust was formed; correct?</p> <p>4 A Those documents were not; but if you look at</p> <p>5 the spreadsheets, the first note goes through the end of</p> <p>6 2018; so the -- for example, the first note is for 29.5</p> <p>7 million dollars. That note is calculated through the end</p> <p>8 of 2018 and so, that note is, I believe, in the body of</p> <p>9 the trust.</p> <p>10 Q Hang on one second?</p> <p>11 A Sure.</p> <p>12 Q So, what you're describing right now is a</p> <p>13 spreadsheet that has been produced to us?</p> <p>14 A Yes.</p> <p>15 Q That purports to show the accrual of some debt</p> <p>16 owed by Free Speech Systems to PQPR; correct?</p> <p>17 A Right.</p> <p>18 Q And what you just described is that those</p> <p>19 spreadsheets showed debt running from some time in late</p> <p>20 2018; correct?</p> <p>21 A Running from or running to?</p> <p>22 There are two notes --</p> <p>23 Q I'm asking you.</p> <p>24 A There are two notes --</p> <p>25 Q I'm not asking about the notes.</p>

June 27, 2022

<p style="text-align: right;">Page 601</p> <p>1 A Okay.</p> <p>2 Q I'm asking about the spreadsheets you were</p> <p>3 referencing.</p> <p>4 A Yeah, the --</p> <p>5 Q Because we can agree that the notes, the</p> <p>6 documents, did not exist in 2018; correct?</p> <p>7 A Per the dates on there, no. Right.</p> <p>8 Q Right.</p> <p>9 And so, what I'm trying understand is when the</p> <p>10 trust was formed, it has to be funded with some asset;</p> <p>11 correct?</p> <p>12 A Right.</p> <p>13 Q And I think that what you were just beginning</p> <p>14 to try to tell me was that the debt owned by PQPR was one</p> <p>15 of the assets held by the trust; is that right?</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 And how was that documented at the time so as</p> <p>19 to place that debt asset into the trust?</p> <p>20 A I don't know. All I have is the note.</p> <p>21 Q Okay.</p> <p>22 Who told you that the AEJ 2018 Trust was owned,</p> <p>23 the debt, purportedly held by PQPR?</p> <p>24 A I don't know that it owns the debt. I think</p> <p>25 that it's in the trust as a part of the body of the</p>	<p style="text-align: right;">Page 603</p> <p>1 Q And you have no idea what instrument affected</p> <p>2 that transfer of debt to the trust; correct?</p> <p>3 A No, I have not seen a document like that.</p> <p>4 Q Have you seen the trust formation document?</p> <p>5 A No.</p> <p>6 Q What other assets were used to fund that trust?</p> <p>7 A To be honest, I'm not sure which -- what assets</p> <p>8 are in there. I know the note is not the only asset; but</p> <p>9 I'm not sure what other assets are in there?</p> <p>10 Q Okay.</p> <p>11 So, the reason that we first started talking</p> <p>12 about this trust is because you were responding to my</p> <p>13 question about a change in ownership structure of PQPR;</p> <p>14 right?</p> <p>15 A Right. Because when the trust was created,</p> <p>16 that changed.</p> <p>17 Q So, tell me how that changed?</p> <p>18 A So, instead of -- I'm not sure if -- so, PQPR</p> <p>19 is owned, in part, PLJR 80 percent, 10 percent of which</p> <p>20 is owned by Carol Jones, who's Mr. Jones's mother; and</p> <p>21 then 80 percent of that was, according to that other</p> <p>22 document, owned by Mr. Jones directly, but now it is</p> <p>23 owned by the trust.</p> <p>24 Q All right.</p> <p>25 So, let's go through that a little bit.</p>
<p style="text-align: right;">Page 602</p> <p>1 trust; but I think that conversation was one I had with</p> <p>2 Mr. Roe back when I was in Texas.</p> <p>3 Q So, you don't know if the AEJ Trust owns the</p> <p>4 debt?</p> <p>5 A I don't know -- PQPR owns the debt, right. So,</p> <p>6 but the body of it is in the trust.</p> <p>7 Q What does that mean?</p> <p>8 A I'm not an estate attorney. I don't know. I</p> <p>9 can't break it down any further than that. When I spoke</p> <p>10 to Mr. Roe about this, I asked what was in the trust, in</p> <p>11 the body of the trust, and it was the note.</p> <p>12 Q The note?</p> <p>13 A Right. The note. The debt.</p> <p>14 Q The debt?</p> <p>15 A Right.</p> <p>16 Q So, Mr. Roe told you that debt owned by PQPR is</p> <p>17 one of the trust's assets?</p> <p>18 A Right.</p> <p>19 Q As of 2018, when it was formed?</p> <p>20 A I don't know when it was put in there, but</p> <p>21 that's one of the assets that's in there.</p> <p>22 Q Okay.</p> <p>23 And you --</p> <p>24 A I think there are other ones in there, but I'm</p> <p>25 not sure.</p>	<p style="text-align: right;">Page 604</p> <p>1 A Sure.</p> <p>2 Q PLJR was owned 90 percent by Mr. Jones</p> <p>3 personally and 10 percent by Carol Jones; correct?</p> <p>4 A Prior to 2018?</p> <p>5 Q Yes.</p> <p>6 A I think so. I think that's what that document</p> <p>7 says, yes.</p> <p>8 Q And then, as a result -- and then PLJR had an</p> <p>9 80 percent stake in PQPR; correct?</p> <p>10 A Right.</p> <p>11 Q And so, by virtue of his 90 percent stake in</p> <p>12 PLJR and PLJR's ensuing 80 percent interest in PQPR,</p> <p>13 Mr. Jones personally had, indirectly, 80 percent</p> <p>14 ownership of PQPR; correct?</p> <p>15 A Of PQPR?</p> <p>16 Q Yes.</p> <p>17 A I believe the total effective number would have</p> <p>18 been in the 70s. It's, like, 72 percent effective;</p> <p>19 because PQPR is owned 20 percent by Dr. and Mrs. Jones;</p> <p>20 and then 80 percent by PLJR who also has a 10 percent</p> <p>21 interest to Carol Jones. So, when you average out those</p> <p>22 numbers, it's something like 72 percent.</p> <p>23 Q Who did that math for you?</p> <p>24 A Mr. Roe did that math for me. I am very bad at</p> <p>25 math.</p>

June 27, 2022

<p style="text-align: right;">Page 605</p> <p>1 Q That's okay. I wouldn't expect you to have</p> <p>2 done it.</p> <p>3 A Yes.</p> <p>4 Q So then, in 2018, I take it that your testimony</p> <p>5 is that Mr. Jones transferred his personal ownership of</p> <p>6 PLJR to the AEJ Trust; correct?</p> <p>7 A To the trust, right.</p> <p>8 Q And so, whereas Mr. Jones, prior to 2018, had a</p> <p>9 72 some-odd percent indirect ownership interest in PQPR,</p> <p>10 now the AEJ 2018 Trust does; correct?</p> <p>11 A Right.</p> <p>12 Q What instrument was -- have you seen any</p> <p>13 documents reflecting that transfer of ownership?</p> <p>14 A I don't think so, no.</p> <p>15 Q Did you ask?</p> <p>16 A I don't remember if I asked or not to be</p> <p>17 honest.</p> <p>18 Q So -- and Mr. Jones told you specifically that</p> <p>19 that was done in order to benefit his children?</p> <p>20 A Right. Because his children are remaindermen</p> <p>21 in the trust. So, yes.</p> <p>22 Q And what that means is that those children do</p> <p>23 not receive any benefit from the AEJ Trust's ownership of</p> <p>24 PQPR until Mr. Jones passes; correct?</p> <p>25 A Right. They don't currently receive any income</p>	<p style="text-align: right;">Page 607</p> <p>1 sure that everything was accounted for and paid. So,</p> <p>2 prior to that, I don't think that there was any clear</p> <p>3 delineation. And so, there have been efforts made over</p> <p>4 the last year to do that. And so, I would assume Alex</p> <p>5 authorized it.</p> <p>6 Q Okay.</p> <p>7 You're not aware -- Free Speech Systems isn't</p> <p>8 aware of anybody else who could authorize Free Speech</p> <p>9 Systems to make \$11,000 daily payment to another</p> <p>10 corporate entity; correct?</p> <p>11 A No, I think Alex would have to authorize it.</p> <p>12 He owns Free Speech.</p> <p>13 Q And Free Speech's testimony here today is that</p> <p>14 those payments, beginning in November of 2021, were</p> <p>15 motivated solely to pay down a debt Free Speech Systems</p> <p>16 purportedly owed to PQPR; is that your testimony?</p> <p>17 A That's my understanding of the purpose of the</p> <p>18 notes, yes.</p> <p>19 Q And how did Free Speech Systems arrive at the</p> <p>20 \$11,000 number?</p> <p>21 A I think it's based on the terms of the note.</p> <p>22 Q Which note?</p> <p>23 A So, the first note is a 30-year note with a</p> <p>24 balloon at the end. But the second note is principal --</p> <p>25 it delineates principal and interest.</p>
<p style="text-align: right;">Page 606</p> <p>1 from the trust.</p> <p>2 Q The trust does generate income; correct?</p> <p>3 A It is generating income, yes.</p> <p>4 Q How is it generating income?</p> <p>5 A It is generating income on the basis of the</p> <p>6 notes that Free Speech pays to PQPR.</p> <p>7 Q Which started when?</p> <p>8 A So, those payments, I believe, started at the</p> <p>9 end of last year, some time toward the end of last year,</p> <p>10 maybe November.</p> <p>11 Q That is November of 2021?</p> <p>12 A Right.</p> <p>13 So those payments are approximately \$11,000 per</p> <p>14 business day from Free Speech to PQPR.</p> <p>15 Q And the initiation of those payments of \$11,000</p> <p>16 from Free Speech Systems to PQPR was initiated why?</p> <p>17 A To pay down the debt between the two companies.</p> <p>18 Q Who authorized Free Speech Systems to begin</p> <p>19 paying that purported debt?</p> <p>20 A I would assume Alex did.</p> <p>21 Q Are you --</p> <p>22 A I didn't ask, but there is a debt and it needed</p> <p>23 to be paid. There were efforts made to make sure that</p> <p>24 there was, you know, all of this financial entanglement</p> <p>25 between the two companies to separate everything and make</p>	<p style="text-align: right;">Page 608</p> <p>1 Q Why don't we pull them up. Let's pull up</p> <p>2 Exhibit 117, because I just saw you were referring to</p> <p>3 your notes of your conversation with Mr. Schwartz;</p> <p>4 correct?</p> <p>5 A Yes. That's when he was explaining to me the</p> <p>6 notes and the agreement between the two notes.</p> <p>7 Q All right.</p> <p>8 So, we pulled up the first one. This is dated</p> <p>9 August 13th, 2020, and tell me what Free Speech Systems'</p> <p>10 understanding is of the purpose of this document and</p> <p>11 what, if any, obligations Free Speech Systems' undertakes</p> <p>12 pursuant to it?</p> <p>13 A So, this looks like the first note for</p> <p>14 approximately \$29.5 million and it outlines the principal</p> <p>15 balance, if you scroll down.</p> <p>16 Q Let's do that. Yep.</p> <p>17 A It also --</p> <p>18 Q Hang on.</p> <p>19 Can you just identify what that is when you say</p> <p>20 principal balance; what is it you're referring to?</p> <p>21 A So, in Subsection B, it talks about the</p> <p>22 principal balance, which is the 29.5 million and then</p> <p>23 there's a percentage rate for interest on those days and</p> <p>24 how they're calculated.</p> <p>25 Q Let me stop you right there.</p>

June 27, 2022

<p style="text-align: right;">Page 609</p> <p>1 A Sure.</p> <p>2 Q In -- I'm sorry. Go up to the stop, please,</p> <p>3 I'm sorry.</p> <p>4 On August 13th of 2020, Free Speech Systems</p> <p>5 entered this note claiming to owe \$29.5 million to PQPR;</p> <p>6 correct?</p> <p>7 A Yes.</p> <p>8 Q And it agreed to pay an interest rate, can you</p> <p>9 scroll back down, of 1.75 -- an annual interest rate of</p> <p>10 1.75 percent on that principal; correct?</p> <p>11 A Right.</p> <p>12 Q All right.</p> <p>13 And it agreed to do -- make monthly payments on</p> <p>14 that principal and interest pursuant to this note?</p> <p>15 A I'm not sure if the monthly -- I'm sorry, daily</p> <p>16 payments are outlined here.</p> <p>17 Q I said monthly -- I meant daily.</p> <p>18 A Yeah, it's daily.</p> <p>19 So, I don't know if the daily payments of the</p> <p>20 \$11,000 per number is in here.</p> <p>21 Q Is it your understanding that the daily \$11,000</p> <p>22 payment equates to a principal and interest payment on</p> <p>23 this balance and interest rate set forth in this note?</p> <p>24 A You mean when you divide it up, will it come up</p> <p>25 to \$11,000 a business day?</p>	<p style="text-align: right;">Page 611</p> <p>1 not sure if you divide it up over 30 years at 1.5 percent</p> <p>2 it comes out \$11,000 per business day. I just -- I'm not</p> <p>3 sure. So --</p> <p>4 Q Did Free Speech Systems start making payments</p> <p>5 on this note in August of 2020, immediately?</p> <p>6 A I don't know.</p> <p>7 Q Okay.</p> <p>8 A I'm not sure.</p> <p>9 Q When did the \$11,000 payments start?</p> <p>10 A I believe, based on my conversations with</p> <p>11 Mr. Roe and Mr. Schwartz, those were happening towards</p> <p>12 the end of last year. So, in 2021.</p> <p>13 Q So, Free Speech Systems today is not prepared</p> <p>14 to testify about any payments on this purported debt</p> <p>15 prior to approximately November of 2021; correct?</p> <p>16 A Right. I don't know if the payments had been</p> <p>17 made prior to that. I know they were definitely at the</p> <p>18 end of last year. But I don't know if they had been made</p> <p>19 prior to that.</p> <p>20 Q All right.</p> <p>21 So, you don't know then whether the AEJ Trust</p> <p>22 2018 had any income prior to the initiation of \$11,000</p> <p>23 payments in November of 2021; correct?</p> <p>24 A Oh, you mean the income that's being -- that</p> <p>25 would be thrown off by the \$11,000 per day?</p>
<p style="text-align: right;">Page 610</p> <p>1 Q Yeah. Really, what I'm asking is how did</p> <p>2 Mr. Jones arrive at the \$11,000 per day number and is it</p> <p>3 based on this note executed in August 2020?</p> <p>4 A I don't know how the \$11,000 was arrived at. I</p> <p>5 don't know if you divide it up and it comes out to</p> <p>6 \$11,000 per day over the period of time. Because --</p> <p>7 Q What's the term of this note?</p> <p>8 A Because the term of the note is 30 years.</p> <p>9 Q Okay.</p> <p>10 A Because it expires in 2050.</p> <p>11 Q Is Free Speech Systems' testimony that when it</p> <p>12 entered this purported promissory note, that it was</p> <p>13 agreeing to pay back the some \$29.5 million with the 1.75</p> <p>14 interest rate over 30 years?</p> <p>15 A Right.</p> <p>16 Q But you don't know whether the \$11,000 daily</p> <p>17 payment is toward the arrangement set out in this note?</p> <p>18 A No, it is.</p> <p>19 Q It is.</p> <p>20 A Those two notes total -- the \$11,000 per</p> <p>21 business day is for both notes. Right.</p> <p>22 Q I see.</p> <p>23 Well, then --</p> <p>24 A I just don't know how they arrived at that</p> <p>25 figure. If you are asking how they arrived at it, I'm</p>	<p style="text-align: right;">Page 612</p> <p>1 Q Right.</p> <p>2 A So, I mean, there were payments being made</p> <p>3 between PQPR and Free Speech. So, PQPR was billing Free</p> <p>4 Speech during this entire time period and they were</p> <p>5 making payments, they just were not regular payments.</p> <p>6 Q We're talking about payments from Free Speech</p> <p>7 Systems to PQPR?</p> <p>8 A Right.</p> <p>9 Q And we're talking about PQPR payments then to</p> <p>10 the AEJ Trust?</p> <p>11 A Right.</p> <p>12 Q So, I'm focused right now just on paid income</p> <p>13 generated by the trust as a result of it's new ownership</p> <p>14 in PQPR debt.</p> <p>15 A Right.</p> <p>16 Q And what I hear you saying is that that income,</p> <p>17 as far as Free Speech Systems is prepared to testify</p> <p>18 today, commenced in about November of 2021; correct?</p> <p>19 A No. Because Free Speech was still making</p> <p>20 payments to PQPR. They were just not the entire</p> <p>21 payments; you understand?</p> <p>22 Q I do, but what --</p> <p>23 A So, those payments that Free Speech was making</p> <p>24 to PQPR, they would still be going into the balance of</p> <p>25 the trust; but you still have a debt on the note because</p>

June 27, 2022

<p style="text-align: right;">Page 613</p> <p>1 they're not paying the entire balance. So, those</p> <p>2 payments that Free Speech was making, although not the</p> <p>3 entire payments, would still be going into the body of</p> <p>4 the trust. It was just not the \$11,000.</p> <p>5 Q But the trust, as I understand it, doesn't own</p> <p>6 any part of PQPR other than the debt; right?</p> <p>7 A I don't think that's accurate because PLJR is</p> <p>8 owned 80 percent by AEJ Trust.</p> <p>9 Q But you understand if Free Speech Systems is</p> <p>10 making payments to PQPR, just in the regular course of</p> <p>11 business?</p> <p>12 A Mm-hm.</p> <p>13 Q That money -- is it your testimony that that</p> <p>14 money, that is, money paid to PQPR in the regular course</p> <p>15 of business, flows as income to the trust?</p> <p>16 A Well, if you just do it -- if you look at -- I</p> <p>17 know you don't have the spreadsheet --</p> <p>18 Q I would tell you that the AEJ Trust -- I don't</p> <p>19 have a spreadsheet, I don't think, that shows AEJ income.</p> <p>20 A A flowchart.</p> <p>21 The flowchart -- I mean, we can try to pull it</p> <p>22 up at a break --</p> <p>23 Q Why don't we do that. But what I'm focused</p> <p>24 specifically on right now is cash income flowing to the</p> <p>25 trust. And I understand one source of it to be the</p>	<p style="text-align: right;">Page 615</p> <p>1 let me just wrap this up, though.</p> <p>2 BY MR. MATTEI:</p> <p>3 Q Whatever income the trust is generating,</p> <p>4 whether it be the \$11,000 daily payments beginning in</p> <p>5 November 2021 or some additional income beyond that, none</p> <p>6 of that income is being paid to any of Mr. Jones's</p> <p>7 children; correct?</p> <p>8 A That's right. Yes.</p> <p>9 Q It's being paid to Mr. Jones; correct?</p> <p>10 A Mr. Jones is an income beneficiary of the</p> <p>11 trust, yes.</p> <p>12 Q Are there any other income beneficiaries?</p> <p>13 A I don't believe so, no.</p> <p>14 Q So, any income paid to the AEJ 2018 Trust as a</p> <p>15 result of debt purportedly owed by Free Speech Systems or</p> <p>16 any other income is directly for the benefit of</p> <p>17 Mr. Jones; correct?</p> <p>18 A Mr. Jones is an income beneficiary of AEJ</p> <p>19 Trust.</p> <p>20 Q So he is the sole beneficiary of any income</p> <p>21 that flows to AEJ Trust as a result of its ownership of</p> <p>22 PQPR's debt; correct?</p> <p>23 A Through the trust, yes.</p> <p>24 MR. MATTEI: Why don't we take a break.</p> <p>25 THE VIDEOGRAPHER: We are off the record.</p>
<p style="text-align: right;">Page 614</p> <p>1 \$11,000 debt payments beginning in November of 2021?</p> <p>2 A That is one source, yes.</p> <p>3 Q Thank you.</p> <p>4 What I am trying to understand is whether there</p> <p>5 are -- there is any other income flowing to the trust;</p> <p>6 and what you started to tell me was that regular payments</p> <p>7 to PQPR, in the course of business, are also flowing to</p> <p>8 the trust. But I'm not aware of -- and that seemed odd</p> <p>9 to me. That's what I'm trying to question you on.</p> <p>10 A Maybe we can look at the flowchart at a break</p> <p>11 and maybe that will answer the question. Because it's</p> <p>12 hard to do it without looking at it. So, I -- you know,</p> <p>13 if we could look at it. I don't want to misstate</p> <p>14 anything. If we can look at the flowchart and just make</p> <p>15 sure. But my impression was -- and I could be wrong --</p> <p>16 was that 80 percent of PLJR is owned by the trust. So,</p> <p>17 80 percent then or not 80 percent, but in the 70s --</p> <p>18 Q I don't want to you do, like -- I don't want to</p> <p>19 you kind of sketch out here what you think might be --</p> <p>20 A Right, that's why I want to pull out -- I want</p> <p>21 to pull up the --</p> <p>22 MR. REILAND: Chris, can we take five</p> <p>23 and --</p> <p>24 MR. MATTEI: Yeah, we can take a break.</p> <p>25 It's about time to take a break anyway. But</p>	<p style="text-align: right;">Page 616</p> <p>1 The time is 11:35.</p> <p>2 (Recess from 11:35 a.m. to</p> <p>3 11:50 a.m.)</p> <p>4 THE VIDEOGRAPHER: We are now on the</p> <p>5 record. The time is 11:50.</p> <p>6 BY MR. MATTEI:</p> <p>7 Q Right before the break, Ms. Paz, you testified</p> <p>8 that Mr. Jones is the sole beneficiary of any income</p> <p>9 flowing to the AEJ 2018 Trust; correct?</p> <p>10 A Yes.</p> <p>11 Q And as you sit here today, you are not aware of</p> <p>12 any other income to that trust other than the \$11,000</p> <p>13 payments beginning in November 2021; correct?</p> <p>14 A Well, as I was saying earlier and, you know, I</p> <p>15 don't know how -- I'm not a trust attorney, but I believe</p> <p>16 there's other income flowing into the trust. As I said,</p> <p>17 if Free Speech is making payments to PQPR not on the</p> <p>18 notes and PQPR is owned 80 percent by PLJR, the income</p> <p>19 flowing from PQPR to PLJR is 80 percent of that, would</p> <p>20 also then -- that would flow into the trust; but I'm</p> <p>21 basing that on what I see in these charts. I'm not sure.</p> <p>22 So.</p> <p>23 Q Which charts are you referring to?</p> <p>24 A I think they were just e-mailed.</p> <p>25 MR. REILAND: They were just disclosed.</p>

June 27, 2022

<p style="text-align: right;">Page 617</p> <p>1 If you could pull those up. I'm sure it would</p> <p>2 help.</p> <p>3 MR. MATTEI: Okay, so just for the record,</p> <p>4 during the break, Attorney Reiland sent our</p> <p>5 office two charts which I believe but we'll</p> <p>6 confirm have not previously been produced to</p> <p>7 us. And those will be marked as what?</p> <p>8 MS. SESHADRI: 127 and 128.</p> <p>9 MR. MATTEI: Okay.</p> <p>10 (Plaintiff's Exhibit 127 was</p> <p>11 marked for identification: Chart.)</p> <p>12 (Plaintiff's Exhibit 128 was</p> <p>13 marked for identification: Chart.)</p> <p>14 BY MR. MATTEI:</p> <p>15 Q So, let's bring up 127 and 128.</p> <p>16 MR. CERAME: Sorry to interrupt. But</p> <p>17 briefly, if they were e-mailed to our office,</p> <p>18 we didn't receive them. So, if somebody at</p> <p>19 Norm's office or your office make sure we</p> <p>20 receive them, I would appreciate it. That's</p> <p>21 all I wanted to --</p> <p>22 MR. REILAND: We can e-mail them to you.</p> <p>23 MR. MATTEI: Are we showing these?</p> <p>24 MS. SESHADRI: I'll show them.</p> <p>25 MR. MATTEI: All right.</p>	<p style="text-align: right;">Page 619</p> <p>1 percent of that income then would flow to PLJR, which, in</p> <p>2 turn, 90 percent is owned by the trust.</p> <p>3 So it would appear to me, at least by looking</p> <p>4 at the charts, that those prior debts, yes, they are</p> <p>5 being paid \$11,000 per day per the notes; but moving</p> <p>6 forward for -- the businesses are still in operation and</p> <p>7 PQPR is still billing Free Speech and Free Speech is</p> <p>8 still paying on those invoices, that that income would</p> <p>9 also flow into the trust.</p> <p>10 Q I take it as would any other income to PQPR</p> <p>11 from any source other than Free Speech Systems; correct?</p> <p>12 A Sure. If there are other sources of income.</p> <p>13 Q So, I take it that Free Speech Systems'</p> <p>14 testimony is that in addition to the \$11,000 daily</p> <p>15 payment being made on this purported debt, all income</p> <p>16 received in the ordinary course of business by PQPR flows</p> <p>17 in accordance with its ownership structure, 72 percent to</p> <p>18 the AEJ Trust; correct?</p> <p>19 A That would be my understanding, yes.</p> <p>20 Q Of which Mr. Jones is the sole income</p> <p>21 beneficiary?</p> <p>22 A That's correct.</p> <p>23 Q Okay.</p> <p>24 And so, since -- have you seen any of those</p> <p>25 numbers in terms of money beyond the \$11,000 daily</p>
<p style="text-align: right;">Page 618</p> <p>1 BY MR. MATTEI:</p> <p>2 Q So, we have a document on Zoom right now IW Org</p> <p>3 Chart No. 1, this is 127. Is this the document you were</p> <p>4 referring to earlier, Ms. Paz, as suggesting to you that</p> <p>5 the AEJ 2018 Trust might have income in addition to the</p> <p>6 \$11,000 daily payments?</p> <p>7 A Well, this is one of two charts that I saw.</p> <p>8 But -- as I said, I'm not a trust attorney, just --</p> <p>9 Q I don't want to you speculate. I want you --</p> <p>10 A But as I --</p> <p>11 Q Hang on a second.</p> <p>12 A Go ahead.</p> <p>13 Q Because I just want to -- Before you give your</p> <p>14 answer, I want to make sure you are mindful of the fact</p> <p>15 that you're testifying to facts as Free Speech Systems.</p> <p>16 So, I'm not asking you to infer or intuit anything. I'm</p> <p>17 just asking you whether -- what the factual basis is for</p> <p>18 Free Speech Systems' testimony that there may be</p> <p>19 additional income to the trust. Go ahead.</p> <p>20 A Well, the factual basis would be looking at</p> <p>21 this chart, Free Speech Systems is owned by Mr. Jones;</p> <p>22 but PQPR is -- Free Speech is paying PQPR aside from the</p> <p>23 notes, right. So, it has this debt from this previous</p> <p>24 time period; but it is still paying PQPR going forward.</p> <p>25 Those payments would flow to PQPR and then 80</p>	<p style="text-align: right;">Page 620</p> <p>1 payment flowing to the trust?</p> <p>2 A You mean other payments that were made from</p> <p>3 Free Speech to PQPR?</p> <p>4 Q No, I mean income to the trust. Because you've</p> <p>5 established that \$11,000 a day is flowing to the trust;</p> <p>6 right?</p> <p>7 A Ultimately, yes, through the other companies,</p> <p>8 yes.</p> <p>9 Q Other than your general testimony regarding</p> <p>10 other PQPR income, have you seen any other documentation</p> <p>11 of income going to the trust?</p> <p>12 A I haven't seen any documents related to what is</p> <p>13 in the trust. So, no.</p> <p>14 Q Okay.</p> <p>15 A And it wouldn't be the whole \$11,000 per day,</p> <p>16 just so we're aware, because Alex -- 20 percent of that</p> <p>17 is owned by David and Carol Jones, right, and then 10</p> <p>18 percent of that then would be -- go to Carol Jones. So,</p> <p>19 it's not the entire \$11,000 per business day. But</p> <p>20 ultimately yes, it would flow to the AEJ Trust of which</p> <p>21 Alex is an income beneficiary. But I haven't seen any of</p> <p>22 those bank statements or anything related to the trust.</p> <p>23 Q And given that the PLJR retains an 80 percent</p> <p>24 interest, as it has throughout, of PQPR, is Alex Jones,</p> <p>25 through his income interest in the AEJ Trust, still in</p>

June 27, 2022

<p style="text-align: right;">Page 621</p> <p>1 operational control of PQPR?</p> <p>2 A I don't know if -- you mean, does he -- I just</p> <p>3 want to clarify. Do you mean does he have a say in the</p> <p>4 day-to-day operations of PQPR?</p> <p>5 Q Yeah.</p> <p>6 A I don't know.</p> <p>7 Q That's one question. And thank you for asking</p> <p>8 it of yourself.</p> <p>9 I take it Free Speech Systems' testimony is</p> <p>10 that it does not know whether Alex Jones has any</p> <p>11 day-to-day involvement in the operations of PQPR;</p> <p>12 correct?</p> <p>13 A No, because I can't testify as to the PQPR</p> <p>14 operations because I don't represent them --</p> <p>15 Q I'm asking about --</p> <p>16 A But I don't know. Right.</p> <p>17 Q But let's just make sure we have a clear</p> <p>18 record. Free Speech Systems is not aware of any</p> <p>19 involvement that Alex Jones has in PQPR's day-to-day</p> <p>20 operations; correct?</p> <p>21 A Right.</p> <p>22 Q Does Free Speech Systems know whether Alex</p> <p>23 Jones has access to PQPR bank accounts?</p> <p>24 A I don't know that, no.</p> <p>25 Q Who is the trustee of the AEJ 2018 Trust?</p>	<p style="text-align: right;">Page 623</p> <p>1 referring to.</p> <p>2 Q Okay.</p> <p>3 A Because that's what I reviewed in connection</p> <p>4 with the deposition.</p> <p>5 Q I see.</p> <p>6 So, are you referring to the summary of</p> <p>7 intercompany transactions that we were looking at</p> <p>8 earlier?</p> <p>9 A Yes, I think that's what it's titled, yes.</p> <p>10 Q Why don't we pull that back up. Do you have</p> <p>11 that in front of you?</p> <p>12 A Yes.</p> <p>13 MR. MATTEI: What's the exhibit number on</p> <p>14 this?</p> <p>15 MS. SESHADRI: 106.</p> <p>16 BY MR. MATTEI:</p> <p>17 Q Is this the spreadsheet you were referring to</p> <p>18 earlier, Ms. Paz?</p> <p>19 A Yes, it is.</p> <p>20 Q Am I to understand from your testimony that</p> <p>21 Free Speech Systems is claiming that the debt it now</p> <p>22 purports to owe to PQPR started accruing in December of</p> <p>23 2014?</p> <p>24 A Yes. That's what the spreadsheet indicates.</p> <p>25 Q And what you have been told is that that is</p>
<p style="text-align: right;">Page 622</p> <p>1 A You know, I feel like I asked this question and</p> <p>2 I was told the answer, but I don't recall as I'm sitting</p> <p>3 here. I'm sorry.</p> <p>4 Q When did the debt, purportedly owed to PQPR by</p> <p>5 Free Speech Systems, first start to accrue?</p> <p>6 A So, if we could pull up the spreadsheets, that</p> <p>7 would probably give us a more accurate answer. But I</p> <p>8 think the spreadsheets start in 2012 or 2014.</p> <p>9 Q Which spreadsheet are you referring to?</p> <p>10 A That is the spreadsheet that analyzes the</p> <p>11 transaction by year of -- between Free Speech and PQPR</p> <p>12 through the end of 2018, resulting in that \$29.5 million</p> <p>13 figure for the first note.</p> <p>14 Q Thank you.</p> <p>15 So, you're referring to what would have been</p> <p>16 referred to in this litigation as Free Speech Systems's</p> <p>17 subsidiary ledgers; correct?</p> <p>18 A I don't know if it's in the subsidiary ledger.</p> <p>19 I'm not sure.</p> <p>20 Q Why don't we pull up the 2012 subsidiary</p> <p>21 ledger, I think you referred to it as a transaction</p> <p>22 report. Let's pull it up.</p> <p>23 A I was specifically referring to the spreadsheet</p> <p>24 that I think was produced for this deposition that</p> <p>25 Mr. Roe and/or Mr. Schwartz created. That's what I was</p>	<p style="text-align: right;">Page 624</p> <p>1 when the debt started accruing; correct?</p> <p>2 A I don't know if I asked that specific question,</p> <p>3 but these are the documents that were produced to me that</p> <p>4 I reviewed. It indicates that. So, yes.</p> <p>5 Q And they were produced to us as well?</p> <p>6 A Yes.</p> <p>7 MR. MATTEI: Can you take that down.</p> <p>8 BY MR. MATTEI:</p> <p>9 Q Who authorized Free Speech Systems to begin to</p> <p>10 go into debt to PQPR at that time?</p> <p>11 A What do you mean who authorized it? I don't</p> <p>12 know that it was ever a conscious decision. PQPR was</p> <p>13 sending us bills or sending Free Speech bills and we were</p> <p>14 not paying the entire of the bills -- the entirety of the</p> <p>15 bills. I'm not sure the reason why. I'm not sure if it</p> <p>16 was -- I don't think it was a conscious decision on</p> <p>17 anyone's part; but -- I don't know if -- I don't think I</p> <p>18 would use the word "authorized," but --</p> <p>19 Q Okay.</p> <p>20 So, this is helpful. So, in 2014, PQPR is</p> <p>21 sending -- in December 2014 PQPR is sending Free Speech</p> <p>22 Systems bills; right?</p> <p>23 A Yes.</p> <p>24 Q As it had been prior to that?</p> <p>25 A Sure.</p>

June 27, 2022

<p style="text-align: right;">Page 625</p> <p>1 Q But in December of 2014, Free Speech Systems</p> <p>2 stops paying those bills in their entirety; correct?</p> <p>3 A I don't know if they stopped, but most of the</p> <p>4 bills were not being paid in their entirety.</p> <p>5 Q What were those -- how was Free Speech Systems</p> <p>6 billed? Was it by paper invoice, by electronic</p> <p>7 submission?</p> <p>8 A They were being invoiced, yes. They were being</p> <p>9 invoiced.</p> <p>10 Q PQPR was causing invoices to be sent to Free</p> <p>11 Speech Systems?</p> <p>12 A Right.</p> <p>13 Q Who was responsible for receiving and</p> <p>14 processing those invoices at Free Speech Systems</p> <p>15 beginning in December of 2014?</p> <p>16 A I don't know and I don't want to guess.</p> <p>17 Q And what were those -- at that time in December</p> <p>18 2014 when this debt started accruing, what was Free</p> <p>19 Speech Systems being invoiced for from PQPR?</p> <p>20 A For costs associated with the products, for</p> <p>21 purchasing the products. So, PQPR purchases the</p> <p>22 products, costs associated with housing the products.</p> <p>23 There also may have been some advertising costs in there.</p> <p>24 I know a couple of years there were advertising costs.</p> <p>25 Q Hang on one second. Hang on one second.</p>	<p style="text-align: right;">Page 627</p> <p>1 Q Hang on a second. Hang on a second.</p> <p>2 I thought you said they were sold on</p> <p>3 infowarsstore.com and infowarsshop.com and you didn't</p> <p>4 know who own those websites?</p> <p>5 A I don't know who owns those websites, but</p> <p>6 ultimately, all of those products are being sold via the</p> <p>7 ads that link back to those websites. I'm not sure who</p> <p>8 owns them. But -- so, when you visit a website on the</p> <p>9 InfoWars.com website, you visit any article and there are</p> <p>10 banners on those articles and it clicks and you can click</p> <p>11 on that link to send you to the PQPR website to purchase</p> <p>12 the products.</p> <p>13 Q Okay.</p> <p>14 But that would be the advertising is money that</p> <p>15 PQPR has to pay Free Speech Systems; right?</p> <p>16 A Right. And if you watch -- if you read the</p> <p>17 spreadsheets, they are being given credit. So, Free</p> <p>18 Speech is being given credits for those advertising.</p> <p>19 Q I'm just asking you right now what PQPR was</p> <p>20 invoicing Free Speech Systems for?</p> <p>21 A For products.</p> <p>22 Q Hang on a second.</p> <p>23 So, but is Free Speech Systems buying the</p> <p>24 product from PQPR? Because that I could understand,</p> <p>25 right. Hey, you're buying this product from us, we're</p>
<p style="text-align: right;">Page 626</p> <p>1 A Sure.</p> <p>2 Q Let's start with the cost of the products.</p> <p>3 A Sure.</p> <p>4 Q Why would Free Speech Systems owe PQPR for the</p> <p>5 cost of products that PQPR was responsible for buying and</p> <p>6 selling?</p> <p>7 A So, PQPR purchases the products and sells the</p> <p>8 products but they're billing for the product sales,</p> <p>9 right; so all of the product sales would then be billed</p> <p>10 to Free Speech, ultimately.</p> <p>11 Q So -- but if PQPR's invoicing Free Speech</p> <p>12 Systems, what you testified to is one of the invoice has</p> <p>13 to do the cost of their products. So, PQPR is saying you</p> <p>14 owe us because we bought this product?</p> <p>15 A Mm-hm.</p> <p>16 Q Right? Is that what you're saying?</p> <p>17 A I believe so.</p> <p>18 Q So, why would Free Speech Systems have to pay</p> <p>19 PQPR for PQPR's purchase of its own product?</p> <p>20 A Well, those products are being sold on the Free</p> <p>21 Speech Systems website, ultimately.</p> <p>22 Q Yeah?</p> <p>23 A Right.</p> <p>24 Q I thought you said that they were sold on --</p> <p>25 A Well --</p>	<p style="text-align: right;">Page 628</p> <p>1 selling it to you, Free Speech Systems, pay us. But</p> <p>2 that's not what I understood you to be saying. What I</p> <p>3 understood you to be saying is PQPR buys the products and</p> <p>4 sells the products; right?</p> <p>5 A PQPR, I believe, buys the products and then</p> <p>6 stores the products and handles the sale end of the</p> <p>7 products and packaging the products. But ultimately,</p> <p>8 Free Speech pays PQPR for the product. So, it is billing</p> <p>9 Free Speech for the products.</p> <p>10 Q So, do you understand why this is a little bit</p> <p>11 confusing -- might be a little confusing? Because if</p> <p>12 PQPR is being its product and then selling its product,</p> <p>13 what is Free Speech Systems getting when it pays for the</p> <p>14 product? Isn't the product going to the third-party</p> <p>15 customer?</p> <p>16 A Right, but the cost of the product is not the</p> <p>17 same thing as what it is actually being sold for.</p> <p>18 Q So, why is Free Speech Systems paying for the</p> <p>19 cost of the product, why wouldn't PQPR pay for that?</p> <p>20 A I don't know the answer to that. I'm just here</p> <p>21 to testify as to how it is.</p> <p>22 Q So, Free Speech Systems' testimony is that</p> <p>23 beginning -- is that one of the things it was invoicing</p> <p>24 PQ -- I'm sorry. Let me start over.</p> <p>25 Free Speech Systems' testimony is that one of</p>

June 27, 2022

<p style="text-align: right;">Page 629</p> <p>1 the things PQPR was billing it for was the cost of PQPR's</p> <p>2 products; correct?</p> <p>3 A Right.</p> <p>4 Q And those bills were coming in on a monthly</p> <p>5 basis to Free Speech Systems?</p> <p>6 A Yes.</p> <p>7 Q What else was PQPR invoicing Free Speech</p> <p>8 Systems for in December 2014?</p> <p>9 A I don't remember off the top of my head. It</p> <p>10 may have been billing them for --</p> <p>11 Q I don't want you to guess.</p> <p>12 A Right. I don't remember looking at it. I</p> <p>13 would -- there are documents there that could refresh my</p> <p>14 recollection, more specifically the spreadsheets.</p> <p>15 Q You mean the spreadsheet we were just looking</p> <p>16 at?</p> <p>17 A Mm-hm.</p> <p>18 Q Okay.</p> <p>19 Bring that up. Do you have it? Okay.</p> <p>20 A So, if you could see the debits, the product</p> <p>21 sales. So, that's what I was saying that the -- that</p> <p>22 PQPR is billing Free Speech for. And then there are some</p> <p>23 credits. So --</p> <p>24 Q Hang on.</p> <p>25 If we're just sitting on the debits column,</p>	<p style="text-align: right;">Page 631</p> <p>1 Q Amongst other things, but I'm just focused now</p> <p>2 on the invoice piece.</p> <p>3 A Right.</p> <p>4 Q Beyond the debt associated with Free Speech</p> <p>5 Systems not paying for the cost of products, Free Speech</p> <p>6 Systems is not aware of any other source of any debt owed</p> <p>7 by Free Speech Systems to PQPR; correct?</p> <p>8 A Right.</p> <p>9 Q Okay.</p> <p>10 So, thank you.</p> <p>11 Getting back to the question that started this</p> <p>12 round then, I asked you who authorized Free Speech</p> <p>13 Systems to start to accrue this debt and I want to go</p> <p>14 back to that question.</p> <p>15 Now, we know that PQPR is invoicing Free Speech</p> <p>16 Systems for the cost of its products and Free Speech</p> <p>17 Systems is not paying, or at least not paying in full;</p> <p>18 right?</p> <p>19 A Right.</p> <p>20 Q So, who made the decision at Free Speech</p> <p>21 Systems to stop paying?</p> <p>22 A I don't know if it was ever a conscious</p> <p>23 decision. So, I don't know if it -- I just -- I don't</p> <p>24 subscribe to the word "authorized" or -- you know, I</p> <p>25 don't know that it was ever a conscious decision on</p>
<p style="text-align: right;">Page 630</p> <p>1 right, this would be, presumably, money that PQPR claims</p> <p>2 it is owed by Free Speech Systems; right?</p> <p>3 A Yes.</p> <p>4 Q And the one source of that debt are product</p> <p>5 sales. At least listed here; correct?</p> <p>6 A Right. At least listed here.</p> <p>7 Q And so, what I'm asking you is, beyond the</p> <p>8 spreadsheet, is -- can Free Speech Systems testify as to</p> <p>9 any other items for which PQPR was billing it or</p> <p>10 invoicing it beginning in December of 2014?</p> <p>11 A PQPR billing Free Speech; right?</p> <p>12 Q Correct.</p> <p>13 A I can't tell by looking at this.</p> <p>14 Q Right. Okay.</p> <p>15 But beyond the spreadsheet, though?</p> <p>16 A Yeah, I don't know.</p> <p>17 Q Well, that's kind of important because one of</p> <p>18 the issues you're here to discuss are the relationship</p> <p>19 between the two entities and -- so, if we close the</p> <p>20 deposition today, Free Speech Systems' testimony will be,</p> <p>21 beginning in December of 2014, a debt started to accrue</p> <p>22 to PQPR as a result of unpaid invoices for the cost of</p> <p>23 products purchased by PQPR; correct?</p> <p>24 A Right. Minus other things. So, but yes.</p> <p>25 Ultimately, yes.</p>	<p style="text-align: right;">Page 632</p> <p>1 anyone's part.</p> <p>2 Q Well, Free Speech Systems receives a bill as</p> <p>3 you testified?</p> <p>4 A Right.</p> <p>5 Q That bill either gets paid or it doesn't get</p> <p>6 paid; right?</p> <p>7 A Mm-hm.</p> <p>8 Q Who decides that?</p> <p>9 A I don't know. I mean, Alex owns the company,</p> <p>10 so -- but I don't know if he was paying attention to it</p> <p>11 that closely. I didn't ask him. So, I don't know.</p> <p>12 Q Was there any discussion between -- so, you</p> <p>13 said Alex Jones owns Free Speech Systems; right?</p> <p>14 A Yes.</p> <p>15 Q And the company to which the money was owed,</p> <p>16 PQPR was, up until 2018, owned by Alex Jones through his</p> <p>17 interest in PLJR; correct?</p> <p>18 A In part.</p> <p>19 Q Well, in part owned by Alex Jones, but Alex</p> <p>20 Jones controlled the majority and controlling interest;</p> <p>21 correct?</p> <p>22 A He controlled the majority percentage, yes.</p> <p>23 Q And so this is a situation where, beginning in</p> <p>24 2014, one company owned by Alex Jones was deciding not to</p> <p>25 pay another company in which Alex Jones was a majority</p>

June 27, 2022

<p style="text-align: right;">Page 633</p> <p>1 owner; correct?</p> <p>2 A I just don't know how to came about, you know,</p> <p>3 I don't know whether it was a conscious decision. I</p> <p>4 don't know how it came about. But ultimately, the answer</p> <p>5 is right, yes. It wasn't one company was not paying</p> <p>6 another company the entirety of what was owed.</p> <p>7 Q Right.</p> <p>8 A Right.</p> <p>9 Q Both owned by Alex Jones?</p> <p>10 A In part. PQPR.</p> <p>11 Q Mr. Jones 100 percent owner of Free Speech</p> <p>12 Systems; correct?</p> <p>13 A Yes.</p> <p>14 Q He is, as of this time, through his interest in</p> <p>15 PLJR, 72-some percent owner of PQPR?</p> <p>16 A PQPR, yes.</p> <p>17 Q And Free Speech Systems is not paying PQPR;</p> <p>18 correct?</p> <p>19 A In its entirety, right.</p> <p>20 Q And so, did Alex Jones -- okay.</p> <p>21 But Free Speech Systems is not prepared to say</p> <p>22 who made the decision at Free Speech Systems to withhold</p> <p>23 money for which it is being invoiced?</p> <p>24 A Right. Like I said, I don't know if it was</p> <p>25 ever a conscious decision. I mean, as I'm sure you've</p>	<p style="text-align: right;">Page 635</p> <p>1 Q The documents that were --</p> <p>2 A Yes, exactly, the notes that put into writing</p> <p>3 the debts and the payments and the structure of the</p> <p>4 repayment.</p> <p>5 Q Prior to August of 2020, when that first note</p> <p>6 was executed, is Free Speech Systems aware of any efforts</p> <p>7 made by PQPR to compel Free Speech Systems to pay it the</p> <p>8 amount it claimed to be owed?</p> <p>9 A Aside from the notes, I'm not aware of anything</p> <p>10 else.</p> <p>11 Q You've never spoken to David Jones?</p> <p>12 A No, I've not spoken to Dr. Jones.</p> <p>13 Q You mentioned several times that during the</p> <p>14 time period 2014 -- December 2014, when this purported</p> <p>15 debt started to accrue and 2020, when the first note was</p> <p>16 executed, there was a lot of what you described as</p> <p>17 financial entanglement between the two companies;</p> <p>18 correct?</p> <p>19 A Right. I mean, in my conversations with</p> <p>20 Mr. Roe, it kind of seemed like that was the case and</p> <p>21 that they've made efforts to make sure that everything is</p> <p>22 more separate and documented and runs more smoothly.</p> <p>23 Q Those efforts, according to Mr. Roe, commenced</p> <p>24 in 2020?</p> <p>25 A I'm not sure when they commenced. I don't know</p>
<p style="text-align: right;">Page 634</p> <p>1 noticed throughout the entirety of the proceedings, there</p> <p>2 was a lot of financial entanglement between the two</p> <p>3 companies. There's no real hierarchical structure, at</p> <p>4 least, at Free Speech. People come and go a lot. So,</p> <p>5 like I said, I don't know whether there was a conscious</p> <p>6 decision. I don't know how it happened or why.</p> <p>7 Q Let me ask the next question: Why did Free</p> <p>8 Speech Systems begin to accrue this debt to PQPR?</p> <p>9 A The why is because it wasn't being paid. But</p> <p>10 the why as it wasn't being paid, the answer is I don't</p> <p>11 know.</p> <p>12 Q So, is it Free Speech Systems' testimony that</p> <p>13 from 2014 to 2018 it racked up a, what, \$29.5 million</p> <p>14 debt?</p> <p>15 A Yes.</p> <p>16 Q And may have just done so unconsciously?</p> <p>17 A I don't know why. So, it may have been</p> <p>18 unconscious, it may have been conscious. I just can't</p> <p>19 answer why.</p> <p>20 Q Is Free Speech Systems aware of anything that</p> <p>21 PQPR attempted to do to compel Free Speech Systems to pay</p> <p>22 it the money it was owed?</p> <p>23 A Aside from the notes? No.</p> <p>24 Q The notes meaning --</p> <p>25 A Meaning --</p>	<p style="text-align: right;">Page 636</p> <p>1 honestly know.</p> <p>2 Q What were the nature of the financial</p> <p>3 entanglement -- of Free Speech Systems's financial</p> <p>4 entanglements with PQPR?</p> <p>5 A Well, I mean, this is one example of the</p> <p>6 invoicing and not being paid completely from one side</p> <p>7 versus another. So, efforts were being made to make sure</p> <p>8 that the debts were documented and re-paid. So, that's</p> <p>9 one example.</p> <p>10 Q What other examples of entanglement were you</p> <p>11 describing?</p> <p>12 A I don't think -- I don't know of -- off the top</p> <p>13 of my head of any other ones. This is obviously the</p> <p>14 biggest one.</p> <p>15 Q Just unpaid invoices?</p> <p>16 A Well, it's \$54 million worth of unpaid</p> <p>17 invoices.</p> <p>18 Q Yeah, actually, can you tell me how you get to</p> <p>19 54 million. Because we were just talking about, on this</p> <p>20 spreadsheet as of December 2018, 29.5 million in debt.</p> <p>21 Is the balance having accrued from 2018 to 2020?</p> <p>22 A Right, so that would be on the second note.</p> <p>23 The second note is for 25.3 million.</p> <p>24 Q Ah. Hang on a second.</p> <p>25 Let's do this, then. Just to clear up then,</p>

June 27, 2022

<p style="text-align: right;">Page 637</p> <p>1 because I want to talk to you about the notes.</p> <p>2 A Mm-hm.</p> <p>3 Q 2014 through August of 2020, Free Speech</p> <p>4 Systems is not aware of any efforts by PQPR to compel</p> <p>5 payment nor of any efforts by Free Speech Systems to make</p> <p>6 full payment on the debt that's purportedly owed;</p> <p>7 correct?</p> <p>8 A Aside from the notes?</p> <p>9 Q The notes weren't until August of 2020. I'm</p> <p>10 talking about the whole time before August of 2018;</p> <p>11 right?</p> <p>12 A Well, that's when the notes were signed. But I</p> <p>13 think it the debts were calculated -- so, the first note</p> <p>14 is calculated through the end of 2018.</p> <p>15 Q Yeah.</p> <p>16 A And then the second note is for after 2018.</p> <p>17 So, 2018 through 2020.</p> <p>18 Q Yes.</p> <p>19 A So, I mean, it, at least, appears to me that</p> <p>20 even though the note was executed in 2020, they were</p> <p>21 making these efforts at the end of 2018.</p> <p>22 Q I just want to -- I want you to be able to</p> <p>23 testify here. I'm not asking to you draw any inferences</p> <p>24 from the dates on which the notes were executed or the</p> <p>25 time period that they purport to cover; okay?</p>	<p style="text-align: right;">Page 639</p> <p>1 Speech Systems about this debt?</p> <p>2 A I don't know if there were specific</p> <p>3 conversations between the two companies. All I could say</p> <p>4 is that they're calculating these debts and the first</p> <p>5 note -- like, so, for example, if they weren't talking</p> <p>6 about it prior to 2020, they would have just calculated</p> <p>7 the end of this first note in 2020.</p> <p>8 Q Ms. Paz, are you just kind of speculating about</p> <p>9 that?</p> <p>10 A I'm just saying, based on my conversations, if</p> <p>11 you read my note, it says there was one at the end of</p> <p>12 2018 for \$29.5 million. That's based on my conversation</p> <p>13 with Mr. Schwartz.</p> <p>14 Q So, in 2020, they're looking back at all this</p> <p>15 money that they claim Free Speech Systems owes PQPR and</p> <p>16 they calculate whatever it is going back to 2018; right?</p> <p>17 A I don't know. I understand what you're saying,</p> <p>18 but I don't know.</p> <p>19 Q I just want a clear answer to my question. And</p> <p>20 I don't want any kind of inferences or speculation.</p> <p>21 As Free Speech Systems designee, is Free Speech</p> <p>22 Systems aware of any negotiations of any kind regarding</p> <p>23 this purported debt prior to August of 2020?</p> <p>24 A I don't know. Like I said. I can only tell</p> <p>25 you what my conversations were with Mr. Schwartz and</p>
<p style="text-align: right;">Page 638</p> <p>1 A Well, I think you are making an inference that</p> <p>2 it says because the date is 2020, that no effort was made</p> <p>3 prior to that. But I don't think that's accurate.</p> <p>4 Q No. I'm asking whether you're aware of any.</p> <p>5 I'm asking you whether -- Because I want to you tell me.</p> <p>6 If, in fact, anybody associated with Free Speech Systems</p> <p>7 or PQPR attempted to negotiate in some way around this</p> <p>8 accruing debt prior to August 2020, I want to know about</p> <p>9 it.</p> <p>10 So, as you sit here today as Free Speech</p> <p>11 Systems's representative, can you testify in any way</p> <p>12 about any discussions between representatives of Free</p> <p>13 Speech Systems or PQPR concerning the accrual of that</p> <p>14 debt prior to August of 2020?</p> <p>15 A Yes.</p> <p>16 What I'm saying is that the first note is</p> <p>17 calculated through the end of 2018 and the first note,</p> <p>18 even though I understand what you're saying that the date</p> <p>19 is August 2020, when I spoke to Mr. Roe and Mr. Schwartz,</p> <p>20 you know, they're calculating this at the end of 2020 and</p> <p>21 that's when the first note was going to be for \$29.5</p> <p>22 million. So, it seems to me these conversations were</p> <p>23 happening in 2018.</p> <p>24 Q So, did Mr. Roe or anybody tell you that, in</p> <p>25 2018, there was any discussion between PQPR and Free</p>	<p style="text-align: right;">Page 640</p> <p>1 that's what he indicated to me.</p> <p>2 Q So, Free Speech Systems' response to that</p> <p>3 question is no, it not aware of any; correct?</p> <p>4 A I don't want to say I'm not aware of any just</p> <p>5 because, like I said, in my conversations with</p> <p>6 Mr. Schwartz, the conversation was that the first note</p> <p>7 was for the end of 2018, so I --</p> <p>8 Q I get it.</p> <p>9 A So, I don't know if that means they were</p> <p>10 happening in 2018. So, it could be --</p> <p>11 Q So, the answer is you don't know?</p> <p>12 A Right. It could be 2018; but I'm not sure.</p> <p>13 So --</p> <p>14 Q Right. So, Free Speech Systems is not aware of</p> <p>15 whether there were any negotiations or discussions</p> <p>16 concerning this debt as between Free Speech Systems and</p> <p>17 PQPR prior to August of 2020; correct?</p> <p>18 A I don't know, right.</p> <p>19 Q Thank you.</p> <p>20 Now I want to talk about the notes. So, let go</p> <p>21 to this first note here. If you can bring it up.</p> <p>22 So, August 13, 2020; right? Do you have it in</p> <p>23 front of you, Ms. Paz?</p> <p>24 A Uh-huh.</p> <p>25 Q I'm going to read the first paragraph: This</p>

June 27, 2022

<p style="text-align: right;">Page 641</p> <p>1 promissory note is made as of the date first written</p> <p>2 above by and between Free Speech Systems, LLC, a Texas</p> <p>3 limited liability company, 3005 South Lamar Boulevard,</p> <p>4 Suite D109-317, Austin Texas and PQPR Holdings Limited,</p> <p>5 LLC, a Nevada limited liability company, 100 Congress</p> <p>6 Avenue, 18th Floor, Austin, Texas; right?</p> <p>7 A I see that, yes.</p> <p>8 Q And the signers of this note -- Can you scroll</p> <p>9 down to the execution page -- are Alex Jones on behalf of</p> <p>10 Free Speech Systems; correct?</p> <p>11 A Yes.</p> <p>12 Q And David Jones signs as the secured party on</p> <p>13 behalf of PQPR Holdings Limited, LLC; right?</p> <p>14 A Yes.</p> <p>15 Q So, who represented Free Speech Systems in</p> <p>16 connection with this transaction?</p> <p>17 A Alex.</p> <p>18 Q Okay.</p> <p>19 How do you know that?</p> <p>20 A He signed as the managing member of Free</p> <p>21 Speech.</p> <p>22 Q Okay.</p> <p>23 So, you're basing that solely on the fact that</p> <p>24 his signature appears?</p> <p>25 A Right.</p>	<p style="text-align: right;">Page 643</p> <p>1 A What do you mean how it was generated? Like,</p> <p>2 who drafted it?</p> <p>3 Q Correct.</p> <p>4 A Oh, I don't know.</p> <p>5 Q Okay.</p> <p>6 Now, you see that David Jones signed on behalf</p> <p>7 of PQPR; correct?</p> <p>8 A Yes.</p> <p>9 Q And he purports to sign as a manager; correct?</p> <p>10 A That's what it says.</p> <p>11 Q Do you know what the basis for his authority is</p> <p>12 to act as a manager on behalf of PQPR?</p> <p>13 A Well, he has an ownership interest in it.</p> <p>14 Q Okay.</p> <p>15 Is that what Free Speech Systems is contending</p> <p>16 was the basis for him to sign on behalf of PQPR here?</p> <p>17 A He can sign on behalf of PQPR. He's -- has an</p> <p>18 ownership I want in it. I haven't seen the</p> <p>19 organizational paperwork for PQPR, so I don't know what</p> <p>20 his official title is within that LLC. So, I can't</p> <p>21 really answer that question.</p> <p>22 Q Okay.</p> <p>23 As of this time, that is the time that this</p> <p>24 document was executed, Alex Jones, through -- as of this</p> <p>25 time, that is August of 2020, Alex Jones, through his</p>
<p style="text-align: right;">Page 642</p> <p>1 Q So, is it Free Speech Systems' testimony that</p> <p>2 Alex Jones handled the negotiations around this</p> <p>3 transaction, personally?</p> <p>4 A I don't know the answer to that. I don't know.</p> <p>5 He would have had to sign it, he's the 100 percent owner</p> <p>6 of Free Speech. Nobody else could sign it.</p> <p>7 Q Nobody else could sign it, but obviously you</p> <p>8 understand in a transaction involving \$25 million,</p> <p>9 oftentimes parties are represented by counsel?</p> <p>10 A Counsel, exactly.</p> <p>11 Q Correct?</p> <p>12 And you're not -- Free Speech Systems is not</p> <p>13 aware of whether Mr. Jones and Free Speech Systems were</p> <p>14 represented in these negotiations by counsel; correct?</p> <p>15 A I don't know.</p> <p>16 Q Is Free Speech Systems aware of any</p> <p>17 negotiations that occurred around this transaction?</p> <p>18 A You mean how the terms ultimately came to be?</p> <p>19 I don't know.</p> <p>20 Q Yeah.</p> <p>21 Is Free Speech Systems aware of whether there</p> <p>22 was any negotiation around this transaction?</p> <p>23 A I don't know.</p> <p>24 Q Is Free Speech Systems aware of how this</p> <p>25 document was generated?</p>	<p style="text-align: right;">Page 644</p> <p>1 interest in the AEJ 2018 Trust, owned an approximately 72</p> <p>2 percent share of PQPR; correct?</p> <p>3 A Right. When you do the math out, that's what</p> <p>4 it works out to.</p> <p>5 Q Now, this particular note -- can we go back up</p> <p>6 to the top, please.</p> <p>7 This particular note pertained to a purported</p> <p>8 debt of \$29.588 million; correct?</p> <p>9 A Yes.</p> <p>10 Q And that is the same amount reflected on that</p> <p>11 spreadsheet we were looking at earlier, purporting to</p> <p>12 document monies owed by Free Speech Systems to PQPR from</p> <p>13 December of 2014 through December of 2018; correct?</p> <p>14 A Yes, I believe those two numbers are the same.</p> <p>15 Q But it's Free Speech Systems' testimony that it</p> <p>16 was not aware whether Free Speech Systems started making</p> <p>17 payments on this note beginning in August of 2020;</p> <p>18 correct?</p> <p>19 A Right. I'm not sure. I don't know the answer</p> <p>20 to that. I know they were definitely at the end of last</p> <p>21 year, but I don't know if they were before that.</p> <p>22 Q Let's go to the second note. Okay. This is</p> <p>23 the November 10, 2021 note. And can you tell me what</p> <p>24 the -- why Free Speech Systems entered this particular</p> <p>25 note in November of 2021?</p>

June 27, 2022

<p style="text-align: right;">Page 645</p> <p>1 A So, after the 2018 -- so there was -- there</p> <p>2 continues to be a balance from 2019 and 2020. So,</p> <p>3 there --</p> <p>4 Q Let me just interrupt you.</p> <p>5 Meaning that from January of 2019 through even</p> <p>6 the date of this note, November 2021, Free Speech Systems</p> <p>7 was continuing to not pay PQPR in full for the cost of</p> <p>8 PQPR's products as PQPR was billing it for; correct?</p> <p>9 A Right. So, this wouldn't be through 2021</p> <p>10 because 2021's books aren't closed yet. So, there is no</p> <p>11 analysis of 2021 for the year. So, this would have been</p> <p>12 for 2019 and 2020, so these were efforts that are being</p> <p>13 made by the accountants to close out the books, right.</p> <p>14 So, come to zero balances and have everything balance</p> <p>15 out.</p> <p>16 So, they did that with the first note at the</p> <p>17 end of 2018, and then for 2019 and 2020 they're</p> <p>18 continuing to try to balance everything out to get to</p> <p>19 that zero for the next year. They see that there's this</p> <p>20 now \$25.3 million debt. So, instead of carrying that</p> <p>21 debt over into the next year, they have the note.</p> <p>22 But this wouldn't account for 2021.</p> <p>23 Q So, is it Free Speech Systems' testimony that</p> <p>24 from January of 2019 through December of 2020, it accrued</p> <p>25 another 25.3 million in debt to PQPR?</p>	<p style="text-align: right;">Page 647</p> <p>1 Q And David Jones signs on behalf of PQPR;</p> <p>2 correct?</p> <p>3 A Yes.</p> <p>4 Q And similar to the August 2020 note, I take it</p> <p>5 that, your testimony is that you are not aware of whether</p> <p>6 Free Speech -- whether Alex Jones personally negotiated</p> <p>7 the terms of this instrument; correct?</p> <p>8 A Right. I don't know.</p> <p>9 Q And you're not aware of whether there was any</p> <p>10 negotiation around this particular instrument; correct?</p> <p>11 A I don't know either way, no.</p> <p>12 Q And you're not aware of the basis for David</p> <p>13 Jones' authority to sign on behalf of PQPR here; correct?</p> <p>14 A Well, I don't represent PQPR, so I don't know</p> <p>15 what their organizational structure is; so I don't know.</p> <p>16 Q You said earlier when describing PQPR's online</p> <p>17 sales activity, you referred to a PQPR website. What</p> <p>18 website is that?</p> <p>19 A I think you asked this question earlier and I</p> <p>20 said I wasn't sure what the name of the site is that it</p> <p>21 links back to. So, all of the ads that are on the Free</p> <p>22 Speech website link back to another website, but I'm not</p> <p>23 sure which site that is.</p> <p>24 Q When you say linked back -- if I'm on</p> <p>25 InfoWars.com; right?</p>
<p style="text-align: right;">Page 646</p> <p>1 A Yes.</p> <p>2 Q And the basis for that debt was the same as it</p> <p>3 had been prior to January 2019, that is, failure to pay</p> <p>4 PQPR for the cost of PQPR's goods?</p> <p>5 A Right.</p> <p>6 Q Any other component of the debt that Free</p> <p>7 Speech Systems is aware of?</p> <p>8 A No. I think that's pretty much it.</p> <p>9 Q And the -- please scroll down.</p> <p>10 Here in November of 2021, the interest rate</p> <p>11 applying to this piece of debt is 1.8 percent; correct?</p> <p>12 A Yes. In paragraph B, yes. That's what it is.</p> <p>13 Q And is this another 30-year term?</p> <p>14 A No. This appears to be coming due on November</p> <p>15 10, 2036. So, it's a shorter term. This would be a</p> <p>16 15-year payment.</p> <p>17 Q Yet, Mr. Jones signs this on behalf of Free --</p> <p>18 Mr. Alex Jones signs this on behalf of Free Speech</p> <p>19 Systems; correct?</p> <p>20 A Can we scroll down?</p> <p>21 Q Yes.</p> <p>22 MR. MATTEI: Scroll down to the signature</p> <p>23 page, please.</p> <p>24 BY THE WITNESS:</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 648</p> <p>1 A Yep.</p> <p>2 Q Free Speech Systems owns that; right?</p> <p>3 A Right.</p> <p>4 Q And I click on a link to an ad; right?</p> <p>5 A Right.</p> <p>6 So, if you have, like, say, a banner at the</p> <p>7 top -- even the home page, there's banners on the home</p> <p>8 page. So, if you click on that, mm-hm.</p> <p>9 Q So, there's a banner ad on the home page at</p> <p>10 InfoWars.com for bone broth, let's say, just by way of</p> <p>11 example?</p> <p>12 A Okay, sure.</p> <p>13 Q I click on that. I get redirected to a</p> <p>14 different website; right?</p> <p>15 A Yes.</p> <p>16 Q Where I can execute a purchase for that bone</p> <p>17 broth; right?</p> <p>18 A Yes.</p> <p>19 Q Is that second website owned by PQPR?</p> <p>20 A I'm not sure who owns it.</p> <p>21 Q And you don't know what it is? That is, you</p> <p>22 don't know the domain name?</p> <p>23 A Right, right.</p> <p>24 Q But is that what you were referring to as the</p> <p>25 PQPR website?</p>

June 27, 2022

<p style="text-align: right;">Page 649</p> <p>1 A Yes.</p> <p>2 Q Okay.</p> <p>3 THE WITNESS: Is this a good point for a</p> <p>4 break?</p> <p>5 MR. MATTEI: It may be. I'm just trying</p> <p>6 to see if there are a couple things I can wrap</p> <p>7 up quick because we are going to have to take a</p> <p>8 lunch.</p> <p>9 Just give me one second, Ms. Paz.</p> <p>10 THE WITNESS: Sure.</p> <p>11 BY MR. MATTEI:</p> <p>12 Q All right.</p> <p>13 Did you review Dan Bidondi's deposition?</p> <p>14 A For today? No.</p> <p>15 Q But at any point?</p> <p>16 A I don't remember. I may have, but I don't</p> <p>17 remember.</p> <p>18 Q Let me see if I can refresh your recollection.</p> <p>19 Do you recall reviewing Mr. Bidondi's testimony</p> <p>20 that he has exchanged text communications with Rob Dew</p> <p>21 concerning this litigation?</p> <p>22 A I don't recall. Do you remember what the texts</p> <p>23 were, maybe give me some context?</p> <p>24 Q They haven't been produced to us.</p> <p>25 A Oh, I don't know, I don't know.</p>	<p style="text-align: right;">Page 651</p> <p>1 Q I mean -- I'm -- I'll just tell you Alex Jones</p> <p>2 testified two weeks ago that Free Speech Systems is</p> <p>3 engaged in a number of affiliate relationships with</p> <p>4 third-party vendors, let's say. So, I'm just asking you,</p> <p>5 as Free Speech Systems's representative, whether you're</p> <p>6 prepared to testify about the nature of those</p> <p>7 relationships?</p> <p>8 A You mean, like, affiliate relationships through</p> <p>9 advertising? Because we do have some advertising</p> <p>10 relationships.</p> <p>11 Q What can you tell me about that?</p> <p>12 A That's another topic. I don't know if you want</p> <p>13 to wait until after lunch, but there are some</p> <p>14 spreadsheets that I believe were produced about the third</p> <p>15 parties that pay us for advertising on our various</p> <p>16 platforms, so there are affiliate relationships regarding</p> <p>17 the advertising and the marketing.</p> <p>18 Q Right. Okay. What other types of affiliate</p> <p>19 relationships do you have?</p> <p>20 A I mean, I'm not sure. It's a very open-ended</p> <p>21 question.</p> <p>22 You know, I can testify as to advertising</p> <p>23 third-party aspect of it. We do have payments made to</p> <p>24 us, like, we have an Amazon shopping, right, so that</p> <p>25 would be a third-party affiliate, I would consider it, so</p>
<p style="text-align: right;">Page 650</p> <p>1 Q What is Rob Dew's current status with Free</p> <p>2 Speech Systems?</p> <p>3 A I did speak to Rob about this. I think he may</p> <p>4 be a contractor now, but I'm not a hundred percent sure.</p> <p>5 Q This would have been a conversation you had</p> <p>6 with Rob Dew going back to your first preparation.</p> <p>7 A From my original, right. Because I did have a</p> <p>8 conversation with him for, like, two hours or so and I</p> <p>9 know his employment status has changed so he might be,</p> <p>10 like, an independent contractor now. But I'm not sure.</p> <p>11 But I can verify it for you.</p> <p>12 Q What's Tim Fruge's current status with Free</p> <p>13 Speech Systems?</p> <p>14 A As with a lot of the people, they kind of come</p> <p>15 and go out of good graces, as they say. So, I believe</p> <p>16 Tim is currently actively employed with Free Speech. He</p> <p>17 stopped for a while, but I think he came back on.</p> <p>18 Q Yeah, you reviewed his deposition; right?</p> <p>19 A I believe I did. I haven't reviewed it for</p> <p>20 today. I think I read it back during my original</p> <p>21 preparation. But I didn't review it for today.</p> <p>22 Q Does Free Speech Systems currently have any</p> <p>23 affiliate relationships?</p> <p>24 A What do you mean? Like, through the</p> <p>25 broadcasts?</p>	<p style="text-align: right;">Page 652</p> <p>1 we sell some of our products there. And they pay us for</p> <p>2 those products.</p> <p>3 Q Does Free Speech Systems -- Does Free Speech</p> <p>4 Systems currently have any affiliate relationship with</p> <p>5 any entities in which Tim Fruge is involved?</p> <p>6 A I don't know. I'm not sure.</p> <p>7 Q All right.</p> <p>8 MR. MATTEI: Let's take our lunch break.</p> <p>9 Is half an hour okay? Would people like more?</p> <p>10 MR. REILAND: I would like 45 minutes.</p> <p>11 THE WITNESS: Yeah, can we do a little</p> <p>12 more than that.</p> <p>13 MR. REILAND: Until 2.</p> <p>14 THE VIDEOGRAPHER: We are off the record,</p> <p>15 the time is 12:42.</p> <p>16 (Recess from 12:42 p.m. to</p> <p>17 1:38 p.m.)</p> <p>18 THE VIDEOGRAPHER: We are now on the</p> <p>19 record. The time is 1:38.</p> <p>20 BY MR. MATTEI:</p> <p>21 Q Ms. Paz, at some point, did Free Speech Systems</p> <p>22 set up a website for the purpose of soliciting donations</p> <p>23 to assist in its legal defense?</p> <p>24 A I believe it did, yes. I'm not sure of the</p> <p>25 dates.</p>

June 27, 2022

<p style="text-align: right;">Page 653</p> <p>1 Q And do you know what that website was?</p> <p>2 A Not off the top of my head, no.</p> <p>3 Q Does website SaveInfoWars ring a bell?</p> <p>4 A I don't know, I'm not aware.</p> <p>5 Q Do you know whether it was set up through</p> <p>6 GiveSendGo?</p> <p>7 A I don't know how it was set up.</p> <p>8 Q Do you know who authorized that it be set up?</p> <p>9 A No.</p> <p>10 Q You're aware obviously that Free Speech Systems</p> <p>11 solicited donations through The Alex Jones Show to that</p> <p>12 fund; correct?</p> <p>13 A Yes.</p> <p>14 Q How much money has Free Speech Systems taken in</p> <p>15 as a result of -- Strike that.</p> <p>16 How much money has Free Speech Systems taken in</p> <p>17 through the Save InfoWars legal defense fund?</p> <p>18 A I don't know. I don't think that was on the</p> <p>19 depo notice, so, I didn't look into it.</p> <p>20 Q The reason I'm asking is because -- well, of</p> <p>21 course, Mr. Jones's compensation is on the depo notice;</p> <p>22 correct?</p> <p>23 A Yes, his compensation is.</p> <p>24 Q And you're aware of approximately \$8 million in</p> <p>25 cryptocurrency donations that were made to Free Speech</p>	<p style="text-align: right;">Page 655</p> <p>1 cryptocurrency donations?</p> <p>2 A I can testify as to his compensation as listed</p> <p>3 in the spreadsheet that I reviewed which does not contain</p> <p>4 any of that. So, outside of the spreadsheet, no.</p> <p>5 Q Okay.</p> <p>6 So, Free Speech Systems is not prepared to</p> <p>7 testify to any fact concerning his compensation beyond</p> <p>8 that which is set forth in the spreadsheet that was</p> <p>9 produced in this case?</p> <p>10 A Well, it's Free Speech Systems's position that</p> <p>11 represents all of Mr. Jones's compensation during those</p> <p>12 time periods.</p> <p>13 Q Okay. And which time periods does that cover?</p> <p>14 A I believe that's through 2020 because, like I</p> <p>15 said earlier, our books for 2021 are not closed yet. So,</p> <p>16 we don't have the numbers through 2020 -- through 2021,</p> <p>17 I'm sorry. So, the numbers would end in 2020.</p> <p>18 Q Well, Free Speech Systems is obviously aware</p> <p>19 what it paid Mr. Jones in 2021; correct?</p> <p>20 A I mean, I'm sure they're in the general ledger,</p> <p>21 but as I said, the books are not closed for that year.</p> <p>22 Q But --</p> <p>23 A I can't testify to any numbers in 2021. I have</p> <p>24 not reviewed any numbers for 2021. They are not</p> <p>25 available to me yet.</p>
<p style="text-align: right;">Page 654</p> <p>1 Systems during the spring of this year?</p> <p>2 A Donations to the fund? Is that what you're</p> <p>3 asking?</p> <p>4 Q Let me backup.</p> <p>5 Are you aware of any cryptocurrency donations</p> <p>6 to Free Speech Systems during the spring of 2022?</p> <p>7 A No. I don't know either way.</p> <p>8 Q So, let me see if I can just narrow this down.</p> <p>9 Free Speech Systems acknowledges that it set up a legal</p> <p>10 defense fund for the purposes of soliciting donations to</p> <p>11 assist in its legal defense in connection with this</p> <p>12 litigation; correct?</p> <p>13 A Yes, I'm aware that that exists.</p> <p>14 Q You're aware that Alex Jones has promoted that</p> <p>15 website and solicited donations to Save InfoWars;</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q Free Speech Systems is not aware of whether it</p> <p>19 received \$8 million -- approximately \$8 million in</p> <p>20 cryptocurrency dough neighs earlier this year?</p> <p>21 A Right. I don't know. I didn't prepare that</p> <p>22 question.</p> <p>23 Q And Free Speech Systems is not prepared to</p> <p>24 testify today as to whether Alex Jones was compensated in</p> <p>25 any way as a result of cashing out of those</p>	<p style="text-align: right;">Page 656</p> <p>1 Q When you say they're not available to you yet,</p> <p>2 you're speaking as Free Speech Systems.</p> <p>3 Is it Free Speech Systems' testimony today that</p> <p>4 it is not capable of testifying as to any compensation it</p> <p>5 paid Mr. Jones in 2021?</p> <p>6 A As I sit here today, that's correct. I cannot</p> <p>7 testify to anything --</p> <p>8 Q I'm not talking about you, personally--</p> <p>9 But is that because that information is not</p> <p>10 available to Free Speech Systems or is that simply</p> <p>11 because you, Brittany Paz, haven't been presented with</p> <p>12 that information?</p> <p>13 A I don't think I could testify to anything for</p> <p>14 numbers for a year that haven't been closed yet. So, I</p> <p>15 don't think they are available to anyone not --</p> <p>16 Q Let's just put it this way: You haven't filed</p> <p>17 your taxes -- your personal taxes for 2022; correct?</p> <p>18 A Right.</p> <p>19 Q But you know that you've been paid by Free</p> <p>20 Speech Systems in 2022; correct?</p> <p>21 A Sure.</p> <p>22 Q And the same is true for Mr. Jones. Mr. Jones</p> <p>23 has not filed or has he filed his 2021 tax return?</p> <p>24 A I don't know. You would to have ask him.</p> <p>25 Q Okay.</p>

June 27, 2022

<p style="text-align: right;">Page 657</p> <p>1 Has Free Speech Systems filed it's 2021 tax</p> <p>2 return?</p> <p>3 A I don't believe so, no.</p> <p>4 Q But, regardless have whether its books have</p> <p>5 been closed or the tax return has been filed, the reality</p> <p>6 is, and you can testify to this, that, in 2021, free</p> <p>7 Speech Systems paid Mr. Jones compensation; correct?</p> <p>8 A Yes. I just don't know how much.</p> <p>9 Q The question I'm asking you is whether you</p> <p>10 don't know how much because that information is not</p> <p>11 reasonably available to Free Speech Systems? Can you</p> <p>12 testify under oath that is why you don't know?</p> <p>13 A That is correct.</p> <p>14 Q That it's just not reasonably available to you?</p> <p>15 A I can't testify to any file numbers regarding</p> <p>16 2021 until our books are closed for that year.</p> <p>17 Q Says who?</p> <p>18 A Says the accountants, says the attorneys,</p> <p>19 says -- I can't testify to anything in 2021.</p> <p>20 Q Okay, so let me just understand that.</p> <p>21 Have you been instructed not to testify</p> <p>22 concerning Mr. Jones' compensation that was paid to him</p> <p>23 in 2021?</p> <p>24 A I don't know how I can be instructed not do</p> <p>25 something when that information is not available to me.</p>	<p style="text-align: right;">Page 659</p> <p>1 not available.</p> <p>2 Q He said -- Mr. Roe told they're not available?</p> <p>3 A Right.</p> <p>4 Q Did Mr. Schwartz tell you they're not</p> <p>5 available?</p> <p>6 A I did speak with Mr. Schwartz about that, too,</p> <p>7 yes.</p> <p>8 Q Did Mr. Schwartz tell that you information</p> <p>9 concerning Mr. Jones's compensation in 2021 was not</p> <p>10 available?</p> <p>11 A Right, because the books weren't closed yet.</p> <p>12 Q He said that as well?</p> <p>13 A Yes, I asked Mr. Schwartz. He said the same</p> <p>14 thing.</p> <p>15 Q Did you ask them -- I assume you asked them</p> <p>16 about 2022 as well and they told you the same thing?</p> <p>17 A If 2021 wasn't available, I didn't even get</p> <p>18 that far. But --</p> <p>19 Q You didn't get that far?</p> <p>20 A I didn't even get that far.</p> <p>21 Q If the Notice of Deposition requires to you</p> <p>22 testify as to any compensation paid to Alex Jones from</p> <p>23 the period 2012 through the date of deposition; correct?</p> <p>24 A That's what it says.</p> <p>25 Q And you are not prepared to testify as to any</p>
<p style="text-align: right;">Page 658</p> <p>1 I can't testify to something that is not even available</p> <p>2 to me.</p> <p>3 Q You haven't even looked; right?</p> <p>4 A I asked what the most recent numbers we have</p> <p>5 available are and --</p> <p>6 Q Let me stop you right there.</p> <p>7 Who did you ask what the most recent</p> <p>8 compensation information for Mr. Jones is available for?</p> <p>9 A I asked -- when I was speaking to Mr. Roe about</p> <p>10 it and Mr. Schwartz when we were going over the</p> <p>11 spreadsheets and --</p> <p>12 Q Let's start with Mr. Roe?</p> <p>13 A Sure.</p> <p>14 Q You asked Mr. Roe what's the most recent</p> <p>15 compensation information we have available for Mr. Jones?</p> <p>16 A Yes. And I was provided the spreadsheet.</p> <p>17 Q You were provided the spreadsheet?</p> <p>18 A Yes.</p> <p>19 Q Did Mr. Roe tell you anything about -- did he</p> <p>20 answer your question directly about what have the most</p> <p>21 recent time peer for which compensation information was</p> <p>22 available?</p> <p>23 A Yes. Because I asked him if we had 2021</p> <p>24 numbers and the information for 2021 and he said those</p> <p>25 books -- the books aren't closed for 2021 yet, so it's</p>	<p style="text-align: right;">Page 660</p> <p>1 compensation for 2021 and 2020; correct?</p> <p>2 A Right. I'm not able to do that.</p> <p>3 Q An that's because you've been instructed both</p> <p>4 by Mr. Schwartz and Mr. Roe that that information simply</p> <p>5 isn't available?</p> <p>6 A Right.</p> <p>7 Q The explanation they gave you for why it wasn't</p> <p>8 available is because Free Speech Systems hasn't closed</p> <p>9 its books for either of those years?</p> <p>10 A Right.</p> <p>11 Q What do you understand "close its books" to</p> <p>12 mean?</p> <p>13 A What I understand, obviously, I'm not an</p> <p>14 accountant, but I understand that the numbers for that</p> <p>15 year are not finalized yet. So, they need to go through</p> <p>16 and make sure everything adds up and everything balances</p> <p>17 out and then the final numbers will come out.</p> <p>18 Q Come out to whom?</p> <p>19 A Be available. I'm not sure what they do with</p> <p>20 it. I'm not an accountant, but that's what I understood</p> <p>21 it to mean.</p> <p>22 Q Okay.</p> <p>23 Let's go to Exhibit 108.</p> <p>24 This is the spreadsheet you were referring to</p> <p>25 earlier regarding Mr. Jones's compensation?</p>

June 27, 2022

<p style="text-align: right;">Page 661</p> <p>1 A Yes.</p> <p>2 Q Who prepared this spreadsheet?</p> <p>3 A I believe Mr. Roe prepared it.</p> <p>4 Q He provided it to you?</p> <p>5 A Yes.</p> <p>6 Q Did he explain it to you?</p> <p>7 A Yes, we discussed it.</p> <p>8 Q The total draws listed in column G, what do you</p> <p>9 understand the figures in that column to represent?</p> <p>10 A So, that would be his total draws -- so,</p> <p>11 there's two asterisks next to total draws and it's</p> <p>12 defined as amounts disbursed to or on behalf of Alex</p> <p>13 Jones, including amounts paid to or on behalf of Kelly</p> <p>14 Jones; so, it would be all of the amounts that Alex</p> <p>15 earned for those years including his W-2 salary, also</p> <p>16 including payments to Kelly Jones.</p> <p>17 Q So, backup now.</p> <p>18 There's a separate column for his W-2;</p> <p>19 correct?</p> <p>20 A Right. So, those are his wages.</p> <p>21 Q Hang on a second.</p> <p>22 So, is it your testimony that the W-2 salary</p> <p>23 listed in column E is also included in the total draw</p> <p>24 figures in column G?</p> <p>25 A I'm not sure.</p>	<p style="text-align: right;">Page 663</p> <p>1 to Kelly be represented by the 2.06 million total listed</p> <p>2 in column L?</p> <p>3 A Right. So, 2.064 million, that would be</p> <p>4 included in column G, the 50.515 million.</p> <p>5 Q So, of the 50.5 million that Mr. Alex Jones</p> <p>6 drew down during the years 2012 through 2020, 2.06</p> <p>7 million of that represented payments to Kelly Jones;</p> <p>8 correct?</p> <p>9 A Right.</p> <p>10 Q Are you prepared to testify today about</p> <p>11 Mr. Jones' tax liability as set forth in column J?</p> <p>12 A I mean, aside from the federal taxes that he</p> <p>13 paid, which are outlined in that column, are you asking</p> <p>14 for anything outside of what we see here in the</p> <p>15 spreadsheet?</p> <p>16 Q As I understand column J, what it purports to</p> <p>17 indicate is that Mr. Jones's federal tax payments were</p> <p>18 included in the draw that he received each year; correct?</p> <p>19 A That the payments that he made to pay for tax</p> <p>20 liability?</p> <p>21 Q Right.</p> <p>22 A Right, that's how I read that, too.</p> <p>23 Q Is that true, though? Look, I'm just reading</p> <p>24 it. I have no association with Free Speech Systems. Is</p> <p>25 that, in fact, the case?</p>
<p style="text-align: right;">Page 662</p> <p>1 Q Okay.</p> <p>2 A That's how I read that but, honestly, I'm not</p> <p>3 sure.</p> <p>4 Q Okay.</p> <p>5 For example, if you take 2016, where Mr. Jones</p> <p>6 was paid, according to this spreadsheet, apparently a</p> <p>7 salary of \$181,925, you can't testify whether that amount</p> <p>8 is included in the 5.98 million he received as part of a</p> <p>9 draw or in addition to that number; correct?</p> <p>10 A Right. I'm not sure.</p> <p>11 Q And you're not sure on that issue with respect</p> <p>12 to any of those years; correct?</p> <p>13 A Right.</p> <p>14 Q With respect to the -- assume with me for a</p> <p>15 moment that the W-2 salary is in addition to the draw</p> <p>16 amount listed in column G; okay?</p> <p>17 A Okay.</p> <p>18 Q It's your understanding that -- what is your</p> <p>19 testimony as to what comprises that draw, excluding any</p> <p>20 potential W-2 salary?</p> <p>21 A So, the draws would be any amounts paid</p> <p>22 directly to Alex through Free Speech. It is also</p> <p>23 including any monies paid to Kelly, because Alex reported</p> <p>24 it on his income taxes as income to him.</p> <p>25 Q And would that amount, that is the amount paid</p>	<p style="text-align: right;">Page 664</p> <p>1 A Federal tax included and draw -- yeah, so that</p> <p>2 means to me that's the tax that he paid on the draw.</p> <p>3 Q Again, I want to be clear, I'm not asking to</p> <p>4 you interpret this document. I'm asking to you testify</p> <p>5 as to what is, in fact, the case. The document just is</p> <p>6 up to help you; but you didn't prepare this document.</p> <p>7 Your only knowledge on this is based on what Mr. Roe told</p> <p>8 you; correct?</p> <p>9 A That is fair.</p> <p>10 Q So, let's take, for example, the year 2017.</p> <p>11 All right? Mr. Jones is listed, according to this</p> <p>12 document, as having drew \$6.79 million during that year;</p> <p>13 correct?</p> <p>14 A Right.</p> <p>15 Q There is a column titled Federal Tax Included</p> <p>16 In Draw, and the number for that particular is 6.6</p> <p>17 million; right?</p> <p>18 A Right.</p> <p>19 Q So, what is the relationship between the 6.9</p> <p>20 million listed in 2017 under column G and 6.6 million</p> <p>21 listed in column J?</p> <p>22 A I'm not sure, just because it doesn't make</p> <p>23 sense for him to pay 6.6 million in federal tax on 6.9.</p> <p>24 So, it doesn't -- so, I don't think that's the tax that</p> <p>25 he paid. It might be the total compensation he paid tax</p>

June 27, 2022

<p style="text-align: right;">Page 665</p> <p>1 on, minus deductions. But I'm not 100 percent sure about</p> <p>2 that. I'm not a tax attorney, so --</p> <p>3 Q You don't know; right?</p> <p>4 A I'm not sure.</p> <p>5 Q And so, for example -- well, it sounds like</p> <p>6 you're not prepared to testify today about what the total</p> <p>7 compensation was that Free Speech Systems paid to</p> <p>8 Mr. Jones in each of these years; correct?</p> <p>9 A No, I can testify as to what he earned on his</p> <p>10 W-2 and the total draws.</p> <p>11 Q But you just testified earlier you don't know</p> <p>12 whether the W-2 information listed here is in addition to</p> <p>13 the draw or included in the draw; correct?</p> <p>14 A I don't think it would be including in the</p> <p>15 draw, just because --</p> <p>16 Q Ms. Paz, you need to testify under oath to a</p> <p>17 fact here.</p> <p>18 A Right, I'm not sure the difference, but --</p> <p>19 Q In other words, can you tell me today with</p> <p>20 certainty, because you're under oath testifying as Free</p> <p>21 Speech Systems; right? Can you tell me today how much</p> <p>22 total compensation Mr. Jones received from Free Speech</p> <p>23 Systems in any of the years 2012 through 2020?</p> <p>24 A I'm just not sure whether or not the W-2</p> <p>25 numbers are included in the total draw numbers. So, I</p>	<p style="text-align: right;">Page 667</p> <p>1 listed in the general ledger; correct?</p> <p>2 A For column G? You mean how was this prepared?</p> <p>3 Q Yes.</p> <p>4 A Right, yeah, so he added the reference, so</p> <p>5 that's where he got the references for those numbers.</p> <p>6 So, right, in our ledger, that's what the number of draws</p> <p>7 is for him for that year.</p> <p>8 Q So, according to this spreadsheet, there's only</p> <p>9 two potential sources of compensation for Mr. Jones from</p> <p>10 Free Speech Systems during these years: One is his W-2</p> <p>11 salary and the other is his draw; right?</p> <p>12 A Right.</p> <p>13 Q Are there any other sources of compensation</p> <p>14 from Free Speech Systems for Mr. Jones during this time</p> <p>15 period?</p> <p>16 A I'm unaware of anything except for these two</p> <p>17 sources of income.</p> <p>18 Q Is that a no? Or is it an I don't know?</p> <p>19 A When I asked what his income was, what Free</p> <p>20 Speech Systems paid to him total, this is what I was</p> <p>21 provided. So, this is what he was paid from Free Speech</p> <p>22 Systems. Anything else was gained from -- if anything</p> <p>23 else, was gained from other sources other than from Free</p> <p>24 Speech. This is what Free Speech paid to Mr. Jones.</p> <p>25 Q This and only this?</p>
<p style="text-align: right;">Page 666</p> <p>1 mean, I can fine that out for you. That's not a big</p> <p>2 deal. But I'm not sure is the answer.</p> <p>3 Q So, the answer is you're not prepared today to</p> <p>4 testify as to what Mr. Jones's total compensation was</p> <p>5 from Free Speech Systems between the years 2012 and 2020;</p> <p>6 correct?</p> <p>7 A As to that particular question, the answer is</p> <p>8 no.</p> <p>9 Q No, you're not prepared to testify to that?</p> <p>10 A I mean, I'm prepared to testify that he has</p> <p>11 drawn \$50.5 million in the eight-year period.</p> <p>12 Q You're prepared to testify that that's what</p> <p>13 that column says; right?</p> <p>14 A Those are his total draws as per the general</p> <p>15 ledgers of how much he drew those years.</p> <p>16 Q You are prepared to say he was compensated at</p> <p>17 least \$50.5 million; correct?</p> <p>18 A Right.</p> <p>19 Q But you can't testify what his total</p> <p>20 compensation was for any of those years; correct?</p> <p>21 A I just don't know if the W-2 numbers are</p> <p>22 included in that. But I don't think so. I think it</p> <p>23 might be it's in addition to, but I'm not sure. So, no.</p> <p>24 Q Is that the only -- well, let me -- so, you</p> <p>25 know that there was a number drawn from for Mr. Jones</p>	<p style="text-align: right;">Page 668</p> <p>1 A Right.</p> <p>2 Q And that's based solely on what Mr. Roe told</p> <p>3 you?</p> <p>4 A Well, this is based on what Mr. Roe has gleaned</p> <p>5 from our general ledgers, from Free Speech's general</p> <p>6 ledgers. So, he reviewed the ledgers and prepared this</p> <p>7 spreadsheet on the basis of that.</p> <p>8 Q Okay.</p> <p>9 But you didn't conduct your own independent</p> <p>10 analysis of the general ledgers; correct?</p> <p>11 A No, no, I did not, no.</p> <p>12 Q So, what Mr. Roe represented to you was he had</p> <p>13 reviewed the general ledgers, he identified only two</p> <p>14 sources of compensation to Mr. Jones from Free Speech</p> <p>15 Systems, those being his B-2 salary and his total draw;</p> <p>16 correct?</p> <p>17 A Right.</p> <p>18 Q He then listed them out here; correct?</p> <p>19 A Right.</p> <p>20 Q But Free Speech Systems cannot testify whether</p> <p>21 or not the draw includes the W-2 salary?</p> <p>22 A Right. I'm just not sure of that aspect of it.</p> <p>23 Q Free Speech Systems' testimony is that, at</p> <p>24 most, Mr. Jones was compensated by Free Speech Systems</p> <p>25 approximately 53-plus-million dollars?</p>

June 27, 2022

<p style="text-align: right;">Page 669</p> <p>1 A Right. If you add the two columns.</p> <p>2 Q From 2012 to 2020?</p> <p>3 A Correct.</p> <p>4 Q And you're not prepared to testify to any other</p> <p>5 sources of compensation Mr. Jones may have had other than</p> <p>6 these two; correct?</p> <p>7 A Well, as far as Free Speech is concerned, these</p> <p>8 are the only sources of compensation.</p> <p>9 Q So, let's just assume for a moment that the</p> <p>10 information Mr. Roe gave you is accurate and therefore</p> <p>11 your testimony is accurate?</p> <p>12 A Right.</p> <p>13 Q Separate from these two sources of information,</p> <p>14 you are not prepared to testify as to any other forms of</p> <p>15 income Mr. Jones may have had; correct?</p> <p>16 A From sources other than Free Speech?</p> <p>17 Q Correct?</p> <p>18 A Right. I don't know if he has other sources of</p> <p>19 income other than Free Speech; that's correct.</p> <p>20 Q And you asked as Free Speech Systems' corporate</p> <p>21 representative for all information concerning Mr. Jones's</p> <p>22 compensation from Free Speech Systems; correct?</p> <p>23 A Right.</p> <p>24 Q And this is the spreadsheet that you were</p> <p>25 provided; correct?</p>	<p style="text-align: right;">Page 671</p> <p>1 Q Who showed you Mr. Jones's tax returns or at</p> <p>2 least a portion of it dealing with Free Speech Systems'</p> <p>3 income?</p> <p>4 A I think that was when I met with Mr. Roe down</p> <p>5 in Texas, he had shown me some of the taxes -- tax</p> <p>6 returns. It was just the portion dealing with Free</p> <p>7 Speech's income.</p> <p>8 Q And you believe that was for two years?</p> <p>9 A I don't know how many years, I don't remember</p> <p>10 which years. I don't have copies of them. I wasn't</p> <p>11 provided with copies.</p> <p>12 Q Was anybody else present during that meeting?</p> <p>13 A Attorney Blott.</p> <p>14 Q Was it your -- did you discuss with Mr. Roe why</p> <p>15 he was not designated to serve as corporate</p> <p>16 representative on the financial subjects listed in the</p> <p>17 notice of deposition?</p> <p>18 A I think that's beyond my pay grade. Those are</p> <p>19 internal discussions --</p> <p>20 Q I'm just asking whether you discussed that with</p> <p>21 him?</p> <p>22 A I didn't discuss it with him.</p> <p>23 Q During your testimony earlier in describing the</p> <p>24 accrual of debt owed by Free Speech Systems to PQPR, you</p> <p>25 testified that there were certain indications in the</p>
<p style="text-align: right;">Page 670</p> <p>1 A Yes.</p> <p>2 Q And this spreadsheet comprises the entirety of</p> <p>3 the information that you are relying in testifying</p> <p>4 concerning his compensation; correct?</p> <p>5 A Right.</p> <p>6 Q Do you know who prepares Mr. Jones's personal</p> <p>7 tax return?</p> <p>8 A I do not. I know that Free -- well, actually,</p> <p>9 strike that.</p> <p>10 I don't know who prepares it.</p> <p>11 Q You're aware that Free Speech Systems does pay</p> <p>12 for certain tax services provided to Mr. Jones; correct?</p> <p>13 A That Free Speech pays for his accountant</p> <p>14 services?</p> <p>15 Q His personal accounting services.</p> <p>16 A Oh, yes.</p> <p>17 Q Have you reviewed any of Mr. Jones's tax</p> <p>18 returns in connection with your work in this case?</p> <p>19 A I believe I was shown, when I was down in</p> <p>20 Texas, although I do not have copies of it, one or maybe</p> <p>21 two years. And because I believe Free Speech's income is</p> <p>22 filed with Mr. Jones's personal return. So, I was shown</p> <p>23 those portions of the return in connection with that.</p> <p>24 But I don't remember for which years. I wasn't shown all</p> <p>25 ten years or whatever it is, eight years.</p>	<p style="text-align: right;">Page 672</p> <p>1 transaction reports, which I believe you've also referred</p> <p>2 to as general ledger, suggesting that money was owed by</p> <p>3 Free Speech Systems to PQPR. Am I -- am I reorienting</p> <p>4 you to that testimony?</p> <p>5 A Yeah, yeah. You mean the questions about how</p> <p>6 they arrived at those numbers for the notes?</p> <p>7 Q I think I remember you indicating that the</p> <p>8 general ledgers included a general ledger account number</p> <p>9 specifically for money owed to PQPR. Was I making that</p> <p>10 up or did you testify to that?</p> <p>11 A I think I testified to a specific account</p> <p>12 number regarding the closed captioning.</p> <p>13 Q Ah.</p> <p>14 A That was what I specifically remember us</p> <p>15 talking about with a number. So, when he asked</p> <p>16 Mr. Schwartz about close captioning, he was able to</p> <p>17 pretty quickly pull up all the payments that were made</p> <p>18 foreclosed captioning because that has a specific account</p> <p>19 number in the ledger and he just pulled up all the</p> <p>20 transactions for that account number.</p> <p>21 Q When did Free Speech Systems first start</p> <p>22 recording in it's general ledger that it owed -- that it</p> <p>23 had a liability due to PQPR?</p> <p>24 A You mean, when it was recording or when they</p> <p>25 noticed it or both, I guess?</p>

June 27, 2022

<p style="text-align: right;">Page 673</p> <p>1 Q When did they first start accounting for it in</p> <p>2 their general ledger?</p> <p>3 A I don't know the answer to that. And only</p> <p>4 because, like I said, there was a lot of financial</p> <p>5 entanglement between the two companies previously and</p> <p>6 there has been recent efforts to disentangle it. So, I'm</p> <p>7 not sure when they would have first started trying to</p> <p>8 figure it out and disentangle everything.</p> <p>9 Q When you say disentangle, the only things that</p> <p>10 they've done to disentangle that you're aware of is</p> <p>11 having executed those two promissory notes; correct?</p> <p>12 A Well, to try to figure out where money is going</p> <p>13 and who owes what to who and for what. So it's been a</p> <p>14 significant effort based on my conversations with Mr. Roe</p> <p>15 and Mr. Schwartz.</p> <p>16 Q Tell me then beyond just Alex Jones and his dad</p> <p>17 executing those two promissory notes, what other work has</p> <p>18 been done to disentangle the financial relationship</p> <p>19 between Free Speech Systems and PQPR?</p> <p>20 A You mean aside from the payments on the notes</p> <p>21 and going forward making sure that all of the amounts are</p> <p>22 being invoiced and paid properly?</p> <p>23 Q Hold on a second.</p> <p>24 A I don't know of anything else.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 675</p> <p>1 closed yet. So, they closed out 2020. So, it would have</p> <p>2 been moving forward from 2021 on.</p> <p>3 Does that make sense?</p> <p>4 Q Beginning in January of 2021, is when I guess</p> <p>5 PQPR first started requiring that Free Speech Systems</p> <p>6 make timely payment on any invoices it received?</p> <p>7 A Well, I mean, I don't know if I would say</p> <p>8 requiring, but based on the invoice and we make sure we</p> <p>9 pay it just so going forward there's not an accrual of</p> <p>10 more debt.</p> <p>11 Q Who's in charge now of making sure those</p> <p>12 payments are made timely?</p> <p>13 A You mean, who is processing those bills for</p> <p>14 payment now?</p> <p>15 Q Mm-hm?</p> <p>16 A I believe it's Melinda.</p> <p>17 Q Melinda Flores?</p> <p>18 A Right.</p> <p>19 Q So, as I understand it, when you were using the</p> <p>20 word entanglement, what you are describing is simply the</p> <p>21 fact that Free Speech Systems was not paying money it</p> <p>22 owes to PQPR on a timely basis, is that what you're</p> <p>23 saying?</p> <p>24 A Right.</p> <p>25 Q And because Free Speech Systems was not paying</p>
<p style="text-align: right;">Page 674</p> <p>1 Well, let's just take those few things.</p> <p>2 One is you mentioned paying on the note.</p> <p>3 Right? So, one thing they have done, according to Free</p> <p>4 Speech Systems is they have executed these promissory</p> <p>5 notes which require regular payments on the debt; right?</p> <p>6 A Right, right, right.</p> <p>7 Q That's one thing they've done.</p> <p>8 A Right.</p> <p>9 Q And according to Free Speech Systems, those</p> <p>10 payments, as least as of November of 2021, are being</p> <p>11 made?</p> <p>12 A Right, right.</p> <p>13 Q What else have they done?</p> <p>14 A And then just, as I said, moving forward,</p> <p>15 making sure that the payments for future purchases are</p> <p>16 being invoiced and then paid properly so we're not</p> <p>17 progressively accruing more debt.</p> <p>18 Q Moving forward from what date has that been put</p> <p>19 in place, wherein Free Speech Systems timely paid any</p> <p>20 invoices and bills sent by PQPR?</p> <p>21 A So, that would be at the end of the second</p> <p>22 promissory note period. So, that would be at the end of</p> <p>23 2020. So, end of 2020 is when the second note -- So,</p> <p>24 2021 was when the second note was signed but it would</p> <p>25 have been for the end of 2020, right, because 2021 is not</p>	<p style="text-align: right;">Page 676</p> <p>1 PQPR the money that PQPR was owed during that time, Free</p> <p>2 Speech Systems was retaining, within its own account,</p> <p>3 money that PQPR was entitled to?</p> <p>4 A Right. So, the ledgers for those years would</p> <p>5 have indicated a loss, right, so it's still --</p> <p>6 Q A loss for whom?</p> <p>7 A A loss for Free Speech.</p> <p>8 So, our books -- the books were still</p> <p>9 reflecting this money as being owed because we were</p> <p>10 receiving the invoices, we were putting the invoices into</p> <p>11 our account -- you know, into the books; and so, from</p> <p>12 year to year, it's carrying over the debt. So, instead</p> <p>13 of carrying that debt over from year to year, my</p> <p>14 understanding is that's why they wanted to zero out the</p> <p>15 books and make it into a note so that they were starting</p> <p>16 from the following year at zero instead of at a negative.</p> <p>17 So, that's why the first note was executed.</p> <p>18 Q I believe that your testimony is that Free</p> <p>19 Speech Systems is not aware of any debt-related payments</p> <p>20 it was making prior to November 2021; right?</p> <p>21 A Oh, you mean payments on the notes? On that</p> <p>22 debt? On that --</p> <p>23 Q Yes, yeah.</p> <p>24 A -- on that \$54 million. I'm not sure when</p> <p>25 those payments are. I know for a fact they started in</p>

June 27, 2022

<p style="text-align: right;">Page 677</p> <p>1 November, but I don't know if there were any other</p> <p>2 payments on that debt being made before that. So, I</p> <p>3 don't know.</p> <p>4 Q I want to ask you some questions -- moving on</p> <p>5 to a different topic, Ms. Paz.</p> <p>6 So Ms. Paz, I want to change topics now to</p> <p>7 discuss the radio audience of Free Speech Systems. And I</p> <p>8 want to show you Exhibit No. 121.</p> <p>9 Why don't we pull that up until we have it in</p> <p>10 front of you, Ms. Paz.</p> <p>11 A I see an e-mail.</p> <p>12 Q Okay. I want you to just take a minute to</p> <p>13 familiarize yourself with it.</p> <p>14 John@InfoWars.com is John Baum; correct?</p> <p>15 A I believe so, yes.</p> <p>16 Q And Professor Tracy is Professor Jim Tracy who</p> <p>17 appeared on the Alex Jones show several times to discuss</p> <p>18 Sandy Hook; correct?</p> <p>19 A Yes, I believe he did.</p> <p>20 Q You see that this e-mail is dated January 8th,</p> <p>21 2013?</p> <p>22 A Yes.</p> <p>23 Q So, less than a month after the Sandy Hook</p> <p>24 shooting; correct?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 679</p> <p>1 that was the response that I received.</p> <p>2 Q Okay.</p> <p>3 Well, you would agree with me that on January</p> <p>4 8th, 2013, John Baum was an employee of InfoWars;</p> <p>5 correct?</p> <p>6 A Yes.</p> <p>7 Q He was one of the producers of The Alex Jones</p> <p>8 Show; correct?</p> <p>9 A I don't remember if he was a producer but he</p> <p>10 was employed there in this time period, yes.</p> <p>11 Q It's fair to say that Free Speech Systems does</p> <p>12 not dispute that as of January 28th, 2013, The Alex Jones</p> <p>13 Show was airing an over 140 stations nationwide with a</p> <p>14 daily listener base of 3 million?</p> <p>15 A I don't have any information that contests</p> <p>16 that, no.</p> <p>17 Q Other than Alex Jones, who did you speak to</p> <p>18 regarding Free Speech Systems audience size?</p> <p>19 A I think I just spoke to Alex about it.</p> <p>20 Q Why don't you put up Exhibit 122. Let's just</p> <p>21 scroll through this.</p> <p>22 Ms. Paz, have you ever seen this document</p> <p>23 before?</p> <p>24 A I'm sorry, what is this?</p> <p>25 Q I'll represent to you that this was produced as</p>
<p style="text-align: right;">Page 678</p> <p>1 Q And Mr. Balm informs Mr. Tracy that Free Speech</p> <p>2 Systems was on over 140 stations nationwide with a daily</p> <p>3 listener base of 3 million, possibly more; right?</p> <p>4 A That's what the e-mail says.</p> <p>5 Q Was that correct as of January of 2013?</p> <p>6 A I don't know. I had this conversation with</p> <p>7 Alex and every time I talked to Alex about this, his</p> <p>8 position is I'm free to air, I'm on -- you can listen to</p> <p>9 me online, you can listen to me anywhere, I'm on the air</p> <p>10 waves. So, the entire plant is capable of listening to</p> <p>11 him, it really difficult to narrow it down.</p> <p>12 As far as this e-mail goes, it looks like what</p> <p>13 it's referring to is there are 140 stations that we air</p> <p>14 on, and if you look at all of the stations and their</p> <p>15 approximate listener base or how many people it's</p> <p>16 potentially reaching just based on where they're</p> <p>17 broadcasting, it's 3 million people. So, that's what</p> <p>18 that e-mail is saying to me. But outside of what I see</p> <p>19 there and that what I just testified to, I can't say</p> <p>20 whether it's right or not.</p> <p>21 Q Well, you've been produced by Free Speech</p> <p>22 Systems to testify concerning its audience. That's one</p> <p>23 of the subjects listed in the Notice of Deposition. You</p> <p>24 know that?</p> <p>25 A I do. And I've made efforts to do that and</p>	<p style="text-align: right;">Page 680</p> <p>1 a transcript of the June 19th, 2017, broadcast of The</p> <p>2 Alex Jones Show?</p> <p>3 A Okay.</p> <p>4 I may have read something like this in a</p> <p>5 different format. The transcripts that I read of the</p> <p>6 shows were by Falzarano Reporters. So, I may have read</p> <p>7 this transcript, but it was just in a different format.</p> <p>8 Q Okay.</p> <p>9 You see the Bates number at the bottom as</p> <p>10 having -- as this being a document that was produced by</p> <p>11 Free Speech Systems?</p> <p>12 A Yes.</p> <p>13 Q And so Free Speech Systems agrees that this is</p> <p>14 in fact a transcript of The Alex Jones Show on June 19th,</p> <p>15 2017; correct?</p> <p>16 A That's what it appears, yes.</p> <p>17 Q Directing your attention to page 8. Go up --</p> <p>18 so, now we are on page 7 going to page 8. Go up a little</p> <p>19 further, please.</p> <p>20 You see it, starting at 18:57, the transcript</p> <p>21 reflects that Alex Jones is speaking?</p> <p>22 A Yes, that's what it says.</p> <p>23 Q And if you go down. If you see there where</p> <p>24 Mr. Jones is referring to a video that Mr. Michael</p> <p>25 Cernovich published on his Facebook page concerning Megyn</p>

June 27, 2022

<p style="text-align: right;">Page 681</p> <p>1 Kelly; correct?</p> <p>2 A That's what it looks like, yes.</p> <p>3 Q And Mr. Jones reported to his audience that</p> <p>4 according to Mr. Cernovich's internal analytics, which</p> <p>5 were contained on his phone and that Mr. Jones had</p> <p>6 viewed, the video had 4.5 million views and then another</p> <p>7 version had 2 million views on somebody else's channel;</p> <p>8 and our channel had a million views and then all my other</p> <p>9 videos together were over 15 million views; do you see</p> <p>10 that?</p> <p>11 A Yes.</p> <p>12 Q You understand that Mr. Jones was discussing</p> <p>13 the total views of videos he had published concerning</p> <p>14 Megyn Kelly; correct?</p> <p>15 A It says, All of my other videos together at 15</p> <p>16 million views. It's unclear how many videos he's talking</p> <p>17 about; but the views of however many videos that is.</p> <p>18 Q Once again, if you go down to the next</p> <p>19 paragraph, Mr. Jones said, so, with his views, referring</p> <p>20 to Mr. Cernovich, that's 22-plus million views in the</p> <p>21 last week on videos we put out online; right?</p> <p>22 A That's what it says.</p> <p>23 Q Mr. Jones was essentially saying in the last</p> <p>24 week, Free Speech Systems videos had received 22 million</p> <p>25 views; correct?</p>	<p style="text-align: right;">Page 683</p> <p>1 subsequent views that it may get after; right.</p> <p>2 Q Right.</p> <p>3 So, fair to say that according to Mr. Jones at</p> <p>4 this time, his Sunday broadcast was getting 2 million</p> <p>5 radio listeners on average; correct?</p> <p>6 A That's what it says, yes.</p> <p>7 Q His week day broadcast was getting 4 million</p> <p>8 radio listeners; correct?</p> <p>9 A If he says it's half, double of that would be</p> <p>10 four, so --</p> <p>11 Q He actually says that. But that's on</p> <p>12 commercial radio?</p> <p>13 A A week day almost 4 million over the three or</p> <p>14 four hours that that's rated. Yes, I see him saying</p> <p>15 that, yes.</p> <p>16 Q And then he goes on and says, and then of</p> <p>17 course there's the internet and live streams and</p> <p>18 everything else. It's huge. We're talking</p> <p>19 conservatively 45 million different people that tune in</p> <p>20 each week. One away or the other, it affects 45 million</p> <p>21 people; right?</p> <p>22 A That's what he said, yes.</p> <p>23 Q And Free Speech Systems doesn't have any reason</p> <p>24 to dispute Mr. Jones's representation to his audience at</p> <p>25 this time, in June of 2017, that he was reaching 45</p>
<p style="text-align: right;">Page 682</p> <p>1 A Including Mr. Cernovich's video, right. That's</p> <p>2 what it says.</p> <p>3 Q Which Free Speech Systems republished.</p> <p>4 A Right, that's what it says.</p> <p>5 Q Can you keep going down, please. A little bit</p> <p>6 further.</p> <p>7 You see going down further, Mr. Jones says to</p> <p>8 his audience, Ladies and gentlemen, my Sunday show is</p> <p>9 only half the size of my weekday broadcast, but I like to</p> <p>10 get ahead of the news. It's got over 100 affiliates</p> <p>11 conservatively according to the ad agencies that get the</p> <p>12 big spectrum of ratings that come in. It has close to 2</p> <p>13 million listeners on average that tune in.</p> <p>14 He's talking about a Sunday broadcast; right?</p> <p>15 A That's what it looks like.</p> <p>16 Q Which he reports gets close to 2 million</p> <p>17 listeners on average, which is half of what his week day</p> <p>18 show would get; right?</p> <p>19 A That's what it says.</p> <p>20 Q And that's only on radio. If you go down</p> <p>21 further, that doesn't include the Internet and live</p> <p>22 streams; correct?</p> <p>23 A Right. It looks like he's only talking about</p> <p>24 his Sunday broadcast. So, it's not talking about -- His</p> <p>25 Sunday broadcast being posted on YouTube and then the</p>	<p style="text-align: right;">Page 684</p> <p>1 million different people that tune in each week; correct?</p> <p>2 A No, I don't have any reason to dispute that.</p> <p>3 MR. MATTEI: Let's go to 123, please.</p> <p>4 BY MR. MATTEI:</p> <p>5 Q You have in front of you, Ms. Paz, an e-mail</p> <p>6 from Scott Bronson, an InfoWars employee to Robert</p> <p>7 Castaneda, also an InfoWars employee?</p> <p>8 A Yes, I see it.</p> <p>9 Q Why don't you just take a minute to review it</p> <p>10 and see if you can scroll down as Ms. Paz needs it.</p> <p>11 A Okay.</p> <p>12 Q So, what was Mr. Bronson's role at Free Speech</p> <p>13 Systems at the time he sent this e-mail?</p> <p>14 A Affiliate relations.</p> <p>15 Q Do you know that or are you just gleaning that</p> <p>16 from the e-mail?</p> <p>17 A I'm gleaning it from the e-mail.</p> <p>18 Q And what does that mean?</p> <p>19 A So, affiliate -- our affiliates would be</p> <p>20 whichever or however many stations we broadcast on. So,</p> <p>21 this information is a summary of all of the platforms</p> <p>22 essentially that we broadcast on or that we are available</p> <p>23 to the public on and approximately how many people they</p> <p>24 reach. And it looks like a break down of who -- the</p> <p>25 types of people.</p>

June 27, 2022

<p style="text-align: right;">Page 685</p> <p>1 Q And who is Mr. Castaneda?</p> <p>2 A You know what, I'm not 100 percent sure of what</p> <p>3 his role was.</p> <p>4 Q What about John Hanson, who is also copied on</p> <p>5 this e-mail?</p> <p>6 A I'm not sure just because also his function has</p> <p>7 shifted over time. So, I'm not sure what function he had</p> <p>8 in this time period.</p> <p>9 Q You agree with me that this e-mail was produced</p> <p>10 to the plaintiffs by the Jones defendants; correct?</p> <p>11 A Can we scroll down just a minute, to the</p> <p>12 bottom?</p> <p>13 Yes, it has a Bates stamp. So, yes.</p> <p>14 Q This is a Free Speech Systems e-mail?</p> <p>15 A Right.</p> <p>16 Q The information that Mr. Bronson was sending to</p> <p>17 Mr. Castaneda, he wanted to be put on the Affiliate One</p> <p>18 sheet; what's the Affiliate One sheet?</p> <p>19 A The Affiliate One sheet is just a very brief</p> <p>20 summary of all of the affiliates and where we appear</p> <p>21 on -- across all of the different stations and broadcast</p> <p>22 systems and how many people we reach. So, it's literally</p> <p>23 just a very short summary. Almost like a resume.</p> <p>24 Q One of the purposes of the Affiliate One sheet</p> <p>25 is to go out and recruit more affiliates to air The Alex</p>	<p style="text-align: right;">Page 687</p> <p>1 daily listeners to The Alex Jones Show?</p> <p>2 A I don't have any reason to dispute it. So, I'm</p> <p>3 not -- talkers.com said it and we were subscribing to it</p> <p>4 in this e-mail. So, no reason to dispute it as of that</p> <p>5 date.</p> <p>6 Q As far as Free Speech Systems is concerned,</p> <p>7 that information is accurate; right?</p> <p>8 A Right.</p> <p>9 Q Right?</p> <p>10 A Right. Sorry, I don't think you heard me.</p> <p>11 MR. MATTEI: Let's go to 124.</p> <p>12 BY MR. MATTEI:</p> <p>13 Q I think what you will see, Ms. Paz, here is 124</p> <p>14 is the actual One pager that was -- the contents of which</p> <p>15 were being summarized in that e-mail. Just take a look</p> <p>16 at 124.</p> <p>17 Would you agree with me that 124 is, in fact,</p> <p>18 the One pagers that was being described in the e-mail</p> <p>19 with the date contained in the e-mail now published on</p> <p>20 the One page.</p> <p>21 A This doesn't have a date on it, but it was</p> <p>22 produced by us, so it is one of our One pages. I just</p> <p>23 don't know if it links specifically to that e-mail for</p> <p>24 that date. But it is at least one of our Affiliate One</p> <p>25 pages.</p>
<p style="text-align: right;">Page 686</p> <p>1 Jones Show by showing those affiliates just how broad his</p> <p>2 reach is; correct?</p> <p>3 A Sure.</p> <p>4 Q It's also used to recruit potential advertisers</p> <p>5 who may want to advertise against The Alex Jones Show to</p> <p>6 show those advertisers just how many people they can</p> <p>7 reach; correct?</p> <p>8 A Sure.</p> <p>9 Q And according to Mr. Bronson's -- Strike that.</p> <p>10 According to Free Speech Systems at this time,</p> <p>11 at the time the e-mail was sent, Free Speech Systems had</p> <p>12 a radio show that had 6 million daily listeners;</p> <p>13 correct?</p> <p>14 A The radio show, right, had 6 million listeners</p> <p>15 and there's an asterisk as to how they came to that</p> <p>16 information.</p> <p>17 Q Do you want to explain that further as to how</p> <p>18 they came to that information?</p> <p>19 A If we scroll town to what the asterisk said.</p> <p>20 Okay. So, that looks like information that they gleaned</p> <p>21 from talkers.com to produce this particular One sheet.</p> <p>22 So, that's where it came from.</p> <p>23 Q And Free Speech Systems -- does Free Speech</p> <p>24 Systems acknowledge that as of the date of this e-mail,</p> <p>25 it did, indeed, have approximately 6 million individual</p>	<p style="text-align: right;">Page 688</p> <p>1 Q Okay.</p> <p>2 A I just don't know if it links back to that</p> <p>3 specific date, that specific e-mail.</p> <p>4 Q I will represent to you that, according to the</p> <p>5 meta data that was produced with this document, that it</p> <p>6 was created an April 4th, 2018, which is just two days</p> <p>7 after the e-mail we just reviewed.</p> <p>8 A Okay. So, that makes sense. Okay.</p> <p>9 Q And if that's the case, then if you see here on</p> <p>10 the radio icon there, it indicates that similar to</p> <p>11 e-mail, Free Speech Systems is reporting that as of April</p> <p>12 2018, it had 6 million listeners on it's AM and FM radio</p> <p>13 stations; correct?</p> <p>14 A Yes.</p> <p>15 Q As far as Free Speech Systems is concerned,</p> <p>16 that was accurate at the time?</p> <p>17 A Yes.</p> <p>18 MR. MATTEI: Finally, let's go down to</p> <p>19 Exhibit 125, please.</p> <p>20 BY MR. MATTEI:</p> <p>21 Q Just take a look at this e-mail, Ms. Paz, and</p> <p>22 when had you a chance to review it I'll ask some</p> <p>23 questions about it.</p> <p>24 A Okay.</p> <p>25 Q All right.</p>

June 27, 2022

<p style="text-align: right;">Page 689</p> <p>1 So, Tom Pappert, in November 2019, was a Free</p> <p>2 Speech Systems employee; correct?</p> <p>3 A Yes.</p> <p>4 Q What was his role?</p> <p>5 A Per this e-mail it looks like he was involved</p> <p>6 in marketing.</p> <p>7 Q And Mr. Pappert, in this e-mail, is reaching</p> <p>8 out to Lisa@EverydayMedia for what purpose?</p> <p>9 A This looks like we were trying to formulate a</p> <p>10 relationship with Henry. Henry is a manufacturer of a</p> <p>11 type of firearm. So, this looks like the person who</p> <p>12 would be in charge of such things, you know, such as</p> <p>13 advertising and such for Henry. And so, it looks like he</p> <p>14 was sending the contact person of who would be</p> <p>15 responsible for that an e-mail to see if we could do</p> <p>16 business with them.</p> <p>17 Q And the business that Free Speech Systems was</p> <p>18 hoping to do with Henry USA was to have Henry USA be --</p> <p>19 purchase advertising on Free Speech Systems programming;</p> <p>20 correct?</p> <p>21 A Right.</p> <p>22 Q In which it would advertise its firearms</p> <p>23 against Mr. Jones's programming; correct?</p> <p>24 A Right.</p> <p>25 Q And at this time, which was a little over a</p>	<p style="text-align: right;">Page 691</p> <p>1 BY MR. MATTEI:</p> <p>2 Q This is Exhibit 2, Ms. Paz.</p> <p>3 A Mm-hm.</p> <p>4 Q Do you see there under the first squiggly line</p> <p>5 there's the name Bob?</p> <p>6 A Yes.</p> <p>7 Q Am I correct that that marks the beginning of</p> <p>8 your notes with your conversation with Mr. Roe?</p> <p>9 A Yes.</p> <p>10 Q You had many -- not many, you had multiple</p> <p>11 conversations with Mr. Roe; correct?</p> <p>12 A Yes.</p> <p>13 Q In this particular conversation, if you look at</p> <p>14 the right-hand side of the page, it seems to indicate 70</p> <p>15 million in sales; correct?</p> <p>16 A Yes. Over 260 business days.</p> <p>17 Q Okay.</p> <p>18 So, what were you recording there from your</p> <p>19 conversation with Mr. Roe?</p> <p>20 A I think we were trying to figure out how to</p> <p>21 quantify the sales that ultimately were done on, you</p> <p>22 know, via PQPR and had originated on InfoWars and figure</p> <p>23 out how that person got there. In other words, from</p> <p>24 where did they click to go and ultimately purchase items</p> <p>25 to try to figure out what amount of money, if any, Sandy</p>
<p style="text-align: right;">Page 690</p> <p>1 year after the e-mails we were just recently looking at,</p> <p>2 Mr. Pappert was representing that the Alex Jones show had</p> <p>3 a 6 million daily radio listeners; correct?</p> <p>4 A That's what the e-mail says.</p> <p>5 Q And Free Speech Systems acknowledges that that</p> <p>6 data was accurate as of November 2019, approximately?</p> <p>7 A I don't have any reason to dispute it, so yes.</p> <p>8 Q Do you know whether Henry USA ever became an</p> <p>9 advertiser on any of Mr. Jones's programming?</p> <p>10 A I don't know off the top of my head, but if you</p> <p>11 would like to refer back to the spreadsheets, it would be</p> <p>12 on there. The advertising income spreadsheets. So, if</p> <p>13 they are on there, then the answer is yes. And if</p> <p>14 they're not, then the answer is no.</p> <p>15 Q Where does Free Speech Systems currently do</p> <p>16 it's banking?</p> <p>17 A Most of our banking is done at Frost Bank,</p> <p>18 currently.</p> <p>19 Q So, for example, all of Mr. Jones -- all of</p> <p>20 Free Speech Systems operating accounts are handled</p> <p>21 through Frost Bank; correct?</p> <p>22 A Yes. I believe we did produce some</p> <p>23 spreadsheets with the bank account information as well.</p> <p>24 MR. MATTEI: Why don't we bring up Ms.</p> <p>25 Paz's handwritten notes on the yellow note pad.</p>	<p style="text-align: right;">Page 692</p> <p>1 Hook content had produced to Free Speech. But I did not</p> <p>2 get a specific -- that's as specific as Bob was able to</p> <p>3 get for me. I got a better answer from Blake; but when I</p> <p>4 asked Bob the question, that was the turn the</p> <p>5 conversation took.</p> <p>6 Q So, the question that you asked Mr. Roe was, in</p> <p>7 substance, is there any way to calculate PQPR sales in</p> <p>8 relation to Free Speech Systems' publication of Sandy</p> <p>9 Hook related content?</p> <p>10 A Right, I was trying to link the Sandy Hook</p> <p>11 content to sales in some way.</p> <p>12 Q What was he -- Did he offer a proposal for how</p> <p>13 you might do that?</p> <p>14 A No. The next sentence under that was no way to</p> <p>15 determine which -- I'm not sure if that says likes or</p> <p>16 generated clicks -- which links generated clicks. So,</p> <p>17 that's as specific as he was able to get with me.</p> <p>18 Q Okay.</p> <p>19 Thank you for explaining what that sentence</p> <p>20 was.</p> <p>21 A Sure.</p> <p>22 Q But what about what appears to be some sort of</p> <p>23 fraction indicating 70 million in sales over 260 days?</p> <p>24 What does that refer to?</p> <p>25 A There was \$70 million in sales over 260</p>

June 27, 2022

<p style="text-align: right;">Page 693</p> <p>1 business days.</p> <p>2 Q In which period?</p> <p>3 A I don't know by looking at this. I'm not sure.</p> <p>4 Q And then, if you go to the left where it says</p> <p>5 2,500 sales per day. Is it your -- is that supposed to</p> <p>6 be the result of doing the division here?</p> <p>7 A No, that's 2,500 total sales, not \$2,500 of</p> <p>8 sales. So, it's 2,500 sales per day, totaling \$70</p> <p>9 million over 260 days.</p> <p>10 Q But you have no idea what time frame this</p> <p>11 refers to?</p> <p>12 A No, not by looking at this note, no. I'm not</p> <p>13 sure what year we were talking about.</p> <p>14 Q Now, when Mr. Roe says, No way to determine</p> <p>15 which links generated clicks, what is he referring to?</p> <p>16 A As I said, I think it's us talking about how to</p> <p>17 determine which content generated the conversion of sales</p> <p>18 on -- for the products.</p> <p>19 Q But Mr. Roe is just an outside accountant;</p> <p>20 right?</p> <p>21 A Right. Well, what I was asking him is, like,</p> <p>22 is there any way for him to determine this. And it</p> <p>23 didn't appear to me he was able to answer this question.</p> <p>24 So, like I said, I went somewhere else.</p> <p>25 Q So, Mr. Roe -- fair to say that following your</p>	<p style="text-align: right;">Page 695</p> <p>1 able to produce a global analytics page of -- because</p> <p>2 when you click on an ad from a specific page -- so, for</p> <p>3 example, say it was one of Adan's articles relating to</p> <p>4 Sandy Hook, on that page there are ads on the side. If</p> <p>5 you click on that ad and are taken to the PQPR website</p> <p>6 where everything is sold, where the products are sold,</p> <p>7 the Google analytics will be able to track that that was</p> <p>8 the origin of the sale and there is a conversion. So, he</p> <p>9 was able to produce to me a Google analytics page,</p> <p>10 although, I mean, I think it's been produced here, in</p> <p>11 which it lists the Sandy Hook related content. I believe</p> <p>12 using search terms; and there was a dollar figure for how</p> <p>13 much of a conversion there was, purchases from those</p> <p>14 pages.</p> <p>15 Q Okay.</p> <p>16 MR. MATTEI: Attorney Reiland, I don't</p> <p>17 know if we have that document.</p> <p>18 MR. REILAND: We'll get it for you.</p> <p>19 MR. MATTEI: I'll need to --</p> <p>20 unfortunately, Ms. Paz, I'll to have keep the</p> <p>21 deposition open on this particular issue</p> <p>22 because I'm not sure which Google analytics</p> <p>23 document you were provided versus ones we were</p> <p>24 provided.</p> <p>25 BY MR. MATTEI:</p>
<p style="text-align: right;">Page 694</p> <p>1 conversation with Mr. Roe, Mr. Roe was not able to</p> <p>2 provide with you a satisfactory answer as to how you</p> <p>3 might go about calculating income in relation to the</p> <p>4 publication of content; correct?</p> <p>5 A Right.</p> <p>6 Q Fair enough.</p> <p>7 You said, so you then went somewhere else. Who</p> <p>8 did you go to?</p> <p>9 A I spoke to Blake Roddy.</p> <p>10 Q Okay.</p> <p>11 Is that conversation in the notes you produced</p> <p>12 today?</p> <p>13 A No. The notes from today are based on a</p> <p>14 telephone conversation I had with him, but I met him when</p> <p>15 I was in Texas and I had a conversation with him in</p> <p>16 Texas.</p> <p>17 Q Okay.</p> <p>18 And Blake Roddy is who?</p> <p>19 A Blake Roddy, as far as I'm aware, runs the</p> <p>20 advertising and marketing department.</p> <p>21 Q All right.</p> <p>22 And you asked him what question?</p> <p>23 A So, I asked him if there was any way to</p> <p>24 quantify how much money had been made in sales directly</p> <p>25 as a result of Sandy Hook related content. And he was</p>	<p style="text-align: right;">Page 696</p> <p>1 Q Did you make a note of in that your notes that</p> <p>2 you had shown me that Google analytics document?</p> <p>3 A I don't know. I produced to you many pages of</p> <p>4 notes and then there were also the typewritten notes that</p> <p>5 I produced as well. So, I'm -- I don't remember. I did</p> <p>6 not read them before today.</p> <p>7 Q Did he show you the document or --</p> <p>8 A He did.</p> <p>9 Q Did he give you a copy of it?</p> <p>10 A No, I didn't have a hard copy, I believe. So,</p> <p>11 at the time I was in Texas, this was in preparation for</p> <p>12 my Texas depositions. I believe he e-mailed it to</p> <p>13 Attorney Blott. But I do recall seeing it.</p> <p>14 Q Did you actually examine the document and</p> <p>15 confirm what he was --</p> <p>16 A Well, I talked to him about it, yes.</p> <p>17 Q And what Mr. Roddy told you is that this</p> <p>18 particular document showed the number of sales that</p> <p>19 originated from somebody clicking on a link that appeared</p> <p>20 on a Sandy Hook related article on InfoWars.com?</p> <p>21 A Correct.</p> <p>22 Q It wouldn't have shown any income generated</p> <p>23 from sales during a time period when Mr. Jones was just</p> <p>24 talking about Sandy Hook; right?</p> <p>25 A No. So, it would have been on those particular</p>

June 27, 2022

<p style="text-align: right;">Page 697</p> <p>1 articles. So, say Mr. Jones was talking about it on his</p> <p>2 show and then somebody -- I mean, he talks about a lot of</p> <p>3 topics on his shows, right. So, I don't know if there's</p> <p>4 a way to narrow down which particular topic drove a</p> <p>5 person to the website. But say just for argument's sake</p> <p>6 somebody hears about Sandy Hook, they want to then go to</p> <p>7 the website. They go to the website and maybe they click</p> <p>8 on the very first ad that's on the home page; and then</p> <p>9 they are linked to purchase products. I don't think</p> <p>10 there's a way for us to tell what drove them there just</p> <p>11 because it's on the home page. And if you look at the</p> <p>12 Google analytics the landing page is the most popular</p> <p>13 page, right. There are hundreds and hundreds of pages.</p> <p>14 The landing page is the most popular page. So, if people</p> <p>15 are clicking on ads on the landing page, I don't think</p> <p>16 there's a way to determine that.</p> <p>17 Q So, your testimony is that your understanding</p> <p>18 of the document Mr. Roddy showed you was that it</p> <p>19 reflected Sandy Hook related articles that had been</p> <p>20 published on InfoWars.com as identified by him and the</p> <p>21 extent to which people had clicked on ads appearing in</p> <p>22 those articles over a particular period of time; correct?</p> <p>23 And whether those people had then --</p> <p>24 A Purchased --</p> <p>25 Q -- bought something?</p>	<p style="text-align: right;">Page 699</p> <p>1 Q So, is it Free Speech Systems' testimony that</p> <p>2 it is unable to calculate the amount of revenue it earned</p> <p>3 as a result of its publication of Sandy Hook related</p> <p>4 content?</p> <p>5 A No. What I'm saying is the publication of</p> <p>6 those articles I can directly link to a conversion to</p> <p>7 product sale. But as far as Mr. Jones talking about it</p> <p>8 on the air, I don't think there's a way to quantify that.</p> <p>9 Q Nor is --</p> <p>10 A But the Adan's articles, I can link those</p> <p>11 because there's an ad on all those articles. And if you</p> <p>12 click on that link and then subsequently purchase an</p> <p>13 item --</p> <p>14 Q Even if you're just looking at that article and</p> <p>15 then you back out of that article and you access</p> <p>16 infowarsstore.com or infowarsshop.com some other way, the</p> <p>17 data you got wouldn't tell you whether that person had</p> <p>18 encountered Sandy Hook related material and then</p> <p>19 purchased a product; correct?</p> <p>20 A I can't say whether they had ever encountered</p> <p>21 Sandy Hook material at all. So, they could have, they</p> <p>22 couldn't have. You know, I don't know. I don't know if</p> <p>23 it's the same person, you know what I'm saying. Somebody</p> <p>24 could be directed to a website and then it not converted,</p> <p>25 back out and then read other material and then click it</p>
<p style="text-align: right;">Page 698</p> <p>1 A That's my understanding of the document, yes.</p> <p>2 Q Do you know what the eighth most popular</p> <p>3 landing page on InfoWars.com?</p> <p>4 A I think we talked about this last time. I think</p> <p>5 it's the Adan Salazar article, FBI says there were no</p> <p>6 homicides in Newtown for that year.</p> <p>7 Q Other than the conversation you had with</p> <p>8 Mr. Roddy, the document he showed you, did you do any</p> <p>9 other work on this question of correlating revenue to</p> <p>10 Sandy Hook related content?</p> <p>11 A No, I think that's as specific as it's able to</p> <p>12 get just because, as I said, you know, if Alex is on the</p> <p>13 air for three hours and he has a list of topics to talk</p> <p>14 about, you're not really sure if people are going to the</p> <p>15 website, what's driving them there -- which topic is</p> <p>16 driving them there. So, I think that's as specific as</p> <p>17 we're able to get with it.</p> <p>18 Q I'm just asking whether you did any further</p> <p>19 work, the answer is no?</p> <p>20 A Right.</p> <p>21 Q When did Mr. Roe first start doing work for</p> <p>22 Free Speech Systems?</p> <p>23 A I don't recall when he was retained. I'm</p> <p>24 sorry. I did know at a point, but I don't remember as I</p> <p>25 sit here.</p>	<p style="text-align: right;">Page 700</p> <p>1 from another link. I don't know.</p> <p>2 Q And Free Speech Systems also can't say whether</p> <p>3 people accessing Sandy Hook related content on social</p> <p>4 media or YouTube then purchased from the store; correct?</p> <p>5 A You mean, are there ads on the YouTube channel?</p> <p>6 Q I'm not talking about ads. I'm talking</p> <p>7 about -- you're aware, obviously, that Free Speech</p> <p>8 Systems, as a matter of practice, attempted to maximize</p> <p>9 the visibility of its on at the point on social media;</p> <p>10 correct?</p> <p>11 A Sure.</p> <p>12 Q That included Sandy Hook related content;</p> <p>13 right?</p> <p>14 A Well, all of its content.</p> <p>15 Q Right.</p> <p>16 So, getting back to this issue of whether Free</p> <p>17 Speech Systems is able to make any calculation concerning</p> <p>18 the amount of revenue it realized as a result of it's</p> <p>19 publication of Sandy Hook related content. I take it</p> <p>20 that Free Speech Systems is not in a position to</p> <p>21 calculate the amount of revenue derived from people who</p> <p>22 encountered Sandy Hook related content on social media</p> <p>23 and then came to the store to purchase products;</p> <p>24 correct?</p> <p>25 I want you to be careful?</p>

June 27, 2022

Page 701	Page 703
<p>1 A You guess it would depend on the platform.</p> <p>2 Q Let's take Facebook.</p> <p>3 A Okay.</p> <p>4 Q We went over these documents the last time.</p> <p>5 Billions of impressions on Facebook --</p> <p>6 A Right.</p> <p>7 Q -- for InfoWars; right?</p> <p>8 A Right.</p> <p>9 Q Correct?</p> <p>10 A Right.</p> <p>11 Q InfoWars audience member accesses an article or</p> <p>12 a video on social media that Free Speech Systems</p> <p>13 published concerning Sandy Hook; correct?</p> <p>14 A Okay.</p> <p>15 Q Just stick with me.</p> <p>16 A Okay.</p> <p>17 Q Does Free Speech Systems have any way of</p> <p>18 knowing whether that person, after having encountered</p> <p>19 that material on social media, then came to InfoWars</p> <p>20 store to purchase a product?</p> <p>21 A Unless it was a direct link to the InfoWars</p> <p>22 store to purchase the products or if it's, say, the post</p> <p>23 says something to the effect of, you know, oh, here's</p> <p>24 Adan's article and then it link's to Adan's article and</p> <p>25 then from there they go and click on an ad, then I can</p>	<p>1 FSS?</p> <p>2 A Yes.</p> <p>3 Q Can you read the next two lines?</p> <p>4 A You are asking me to interpret my handwriting.</p> <p>5 That's difficult.</p> <p>6 Q Not interpret yet, I just want you to read it.</p> <p>7 A That's difficult, too.</p> <p>8 Based on how many ads -- I'm not really sure</p> <p>9 after that -- Based on how many ads and on average</p> <p>10 monthly about 566,000. So, this is what PQPR pays to FSS</p> <p>11 to market on our website?</p> <p>12 Q Can you tell who gave you that information?</p> <p>13 A It wasn't Daria.</p> <p>14 Q Let's go down further then to see if there's</p> <p>15 any context below that that might help, Ms. Paz.</p> <p>16 A This might have been from my conversation with</p> <p>17 Blake; because I spoke to him about he was explaining to</p> <p>18 me that exit page -- wait -- yeah, that's a different</p> <p>19 person.</p> <p>20 He was explaining to me the Google analytics</p> <p>21 and how to read it. So, if you look at it says we have</p> <p>22 two Google accounts, one is for the store?</p> <p>23 Q Where are you?</p> <p>24 A In the middle of the page. It says two</p> <p>25 accounts.</p>
Page 702	Page 704
<p>1 track that. But if it's a post that says, you know,</p> <p>2 check out Alex's, you know, broadcast today and it's a</p> <p>3 link to a video with his broadcast and then a link from</p> <p>4 there just to the general story, there's no way for me to</p> <p>5 tell how or why they went to the store.</p> <p>6 But if it's -- like I said, if it's a link</p> <p>7 directly to the Sandy Hook content on the website, I</p> <p>8 would be able to track that.</p> <p>9 Q I'm talking about total revenue to Free Speech</p> <p>10 Systems brought in by people who encountered Sandy Hook</p> <p>11 related content. Free Speech Systems is not able to</p> <p>12 calculate that total revenue in any way; correct?</p> <p>13 A Unless it's a specific link from a specific</p> <p>14 article, then no.</p> <p>15 Q Can you go down to page 13 of that exhibit,</p> <p>16 please.</p> <p>17 Before we get there -- Are you there? Okay.</p> <p>18 THE WITNESS: Can we take a bathroom break</p> <p>19 at some point?</p> <p>20 MR. MATTEI: Yeah. Let me ask these next</p> <p>21 two questions; is that okay?</p> <p>22 THE WITNESS: Sure. Yup.</p> <p>23 BY MR. CERAME:</p> <p>24 Q If you look at the top of page 13, you see</p> <p>25 there your note marketing and then PQPR with an arrow to</p>	<p>1 Q Okay.</p> <p>2 A So, one is the store where the products are</p> <p>3 sold and you could see where the traffic is coming from.</p> <p>4 Right. So, that's the basis of the prior testimony of,</p> <p>5 you know, I can see how people are coming on to the store</p> <p>6 to purchase items as long as they're clicking -- like,</p> <p>7 where they're clicking the ads from. And then the</p> <p>8 InfoWars website has its own separate Google analytics.</p> <p>9 So, I believe this whole page is my</p> <p>10 conversation with Blake.</p> <p>11 Q Why do you have Zimmerman there?</p> <p>12 A He may have -- he may have come up in the</p> <p>13 conversation. But I didn't put anything after that, so</p> <p>14 I'm not really sure what we were talking about.</p> <p>15 Q It's your testimony that Blake Roddy told you</p> <p>16 that PQPR was paying Free Speech Systems approximately</p> <p>17 \$566,000 a month to advertise products on Free Speech</p> <p>18 Systems platforms?</p> <p>19 A I mean, again, this is just based on my notes.</p> <p>20 That's what I think. But I'm not 100 percent sure.</p> <p>21 Q Do you have a time frame?</p> <p>22 A It just says monthly. So, every month.</p> <p>23 Q So, you don't know whether that was every month</p> <p>24 during 2020 or every month from 2012 to 2020? You have</p> <p>25 no idea?</p>

June 27, 2022

<p style="text-align: right;">Page 705</p> <p>1 A I don't know. But it will be on the ledger.</p> <p>2 So, like, for the primary spreadsheet that we were</p> <p>3 looking at earlier, I can't remember the exhibit number</p> <p>4 it was on, but if you look on that, the credits that Free</p> <p>5 Speech was given from PQPR, those are on there. So that</p> <p>6 would have included these credits for marketing.</p> <p>7 Because, remember, Free Speech owes PQPR money for the</p> <p>8 product, but PQPR owes Free Speech money for the</p> <p>9 advertising. So, on that spreadsheet, Free Speech is</p> <p>10 being given a credit for that advertising on that sheet.</p> <p>11 Q Is it Free Speech's position that the credits</p> <p>12 reflected in that spreadsheet concerning transaction</p> <p>13 between Free Speech Systems and PQPR were not actual</p> <p>14 payments but simply credits? Do you know what I mean by</p> <p>15 that?</p> <p>16 A That's what it appears to me when I asked</p> <p>17 Mr. Roe about that question, he said that instead of for</p> <p>18 that time period --</p> <p>19 Q Which time period are you talking about?</p> <p>20 A From 2012 to 2018, for that particular</p> <p>21 spreadsheet they were being given credits.</p> <p>22 Q Okay. So, let me --</p> <p>23 A And -- okay, go ahead.</p> <p>24 Q Let me just ask the question then. From 2012</p> <p>25 to 2018, Free Speech Systems didn't receive any cash</p>	<p style="text-align: right;">Page 707</p> <p>1 Q What I'm asking you is in 2013, let's just take</p> <p>2 2013 for an example. In 2013, was it being recorded in</p> <p>3 Free Speech Systems's general ledger in realtime that</p> <p>4 PQPR owed Free Speech Systems money for advertising that</p> <p>5 had not been paid?</p> <p>6 A I don't think there was -- I don't know that</p> <p>7 there was an expectation that they pay it. I think that</p> <p>8 at the time there was an expectation that the account get</p> <p>9 credited. So, all of that was being done in realtime.</p> <p>10 Like, so, PQPR were sending these invoices, we were</p> <p>11 updating our ledger that we owed this money to PQPR, and</p> <p>12 we were also updating our ledger that owed us</p> <p>13 for accounting -- or --</p> <p>14 Q Is Free Speech Systems sending PQPR invoices</p> <p>15 for the advertising that PQPR had done on Free Speech</p> <p>16 Systems platforms?</p> <p>17 A I believe so, yes. I did much a conversation</p> <p>18 with Mr. Roe at some point, basically about how the</p> <p>19 advertising is calculated. And there is a formula. I'm</p> <p>20 not sure if there's a spreadsheet on it. I may have seen</p> <p>21 a spreadsheet. But it's basically cost per click or</p> <p>22 costs per ad or banner on the website. So, there was a</p> <p>23 way in which they were calculating these things and</p> <p>24 billing them out to PQPR.</p> <p>25 Q But my question was who was in charge of -- who</p>
<p style="text-align: right;">Page 706</p> <p>1 payments from PQPR for its advertising, it just basically</p> <p>2 received an IOU; correct?</p> <p>3 A It credited their account, right. So, it</p> <p>4 credited --</p> <p>5 Q You understand what I mean?</p> <p>6 A -- what Free Speech Systems owed PQPR.</p> <p>7 Q Hang on a second.</p> <p>8 You know what I mean? Like, if PQPR is buying</p> <p>9 advertising from Free Speech Systems --</p> <p>10 A There's no money exchanged. That's what you're</p> <p>11 asking. There was no money exchanged.</p> <p>12 Q There's never any money exchanged?</p> <p>13 A Right. That's correct.</p> <p>14 Q PQPR didn't actually pay Free Speech Systems,</p> <p>15 it just accounted for whatever the value of those</p> <p>16 payments might have been?</p> <p>17 A And then adjusted the balance that Free Speech</p> <p>18 Systems owed accordingly.</p> <p>19 Q Is it Free Speech Systems' testimony that that</p> <p>20 method of accounting occurred in realtime from 2012</p> <p>21 through 2020?</p> <p>22 A Oh, I don't know when it occurred. I know it's</p> <p>23 not occurring any more. But during that time period,</p> <p>24 that's what was happening. I don't know how -- what time</p> <p>25 period -- if it was happening monthly --</p>	<p style="text-align: right;">Page 708</p> <p>1 was the top accountant at Free Speech Systems in 2013?</p> <p>2 A I don't know.</p> <p>3 Q Let me represent to you that Lydia</p> <p>4 Zapada-Hernandez was the top accountant at Free Speech</p> <p>5 Systems?</p> <p>6 A Okay.</p> <p>7 Q In 2013, Free Speech Systems' testimony is that</p> <p>8 it would invoice PQPR for any advertising that it aired</p> <p>9 on PQPR's behalf; right?</p> <p>10 A Right.</p> <p>11 Q And that would initially be recorded in Free</p> <p>12 Speech Systems's books under accounts receivable;</p> <p>13 correct?</p> <p>14 A Honestly, I don't know. You have to look at</p> <p>15 the general ledger, I don't know.</p> <p>16 Q Is it Free Speech Systems' testimony though</p> <p>17 that once that invoice was generated, it would appear in</p> <p>18 realtime in Free Speech Systems's general ledger?</p> <p>19 A Yes. Because they are recorded as credits that</p> <p>20 were being given from PQPR. So, yes.</p> <p>21 Q I understand they are recorded now. I</p> <p>22 understand that is what has been presented to us, okay,</p> <p>23 in that spreadsheet.</p> <p>24 That spreadsheet was created for purposes of</p> <p>25 litigation; correct? The PQPR/Free Speech Systems</p>

June 27, 2022

<p style="text-align: right;">Page 709</p> <p>1 transactions?</p> <p>2 A Right, but those were in the 2012 ledgers.</p> <p>3 Q That's what I'm asking you.</p> <p>4 A Right. They were in the 2012 ledgers.</p> <p>5 Q Well, hang on a second.</p> <p>6 A Yup.</p> <p>7 Q It's Free Speech Systems' testimony that any</p> <p>8 advertising sold to PQPR by Free Speech Systems was</p> <p>9 entered in realtime as it occurred; correct?</p> <p>10 A Well, yes. And the reason why I know that is</p> <p>11 because when I spoke to Bob and he produced that</p> <p>12 spreadsheet, those were numbers that he took specifically</p> <p>13 from those years' ledgers. So, those ledgers, those were</p> <p>14 in there for those years. So, yes.</p> <p>15 Q When Mr. Roe reviewed them they were in there?</p> <p>16 A Yes, I mean obviously I didn't review them</p> <p>17 myself, but yes.</p> <p>18 Q Is it Free Speech Systems' testimony that the</p> <p>19 ledgers that have been produced in this case for the</p> <p>20 years 2012 to 2020 are the ledgers that existed at the</p> <p>21 time? And have not been since altered?</p> <p>22 A I have no reason to believe they've been</p> <p>23 altered.</p> <p>24 Q Have you seen any invoices Free Speech Systems</p> <p>25 sent to PQPR?</p>	<p style="text-align: right;">Page 711</p> <p>1 Free Speech Systems uses to calculate the amount it</p> <p>2 charges advertisers to advertise on its platforms;</p> <p>3 correct?</p> <p>4 A Yes, just with the exception of I don't know if</p> <p>5 it's all advertisers or if it's PQPR has a specific rate</p> <p>6 or if they get a discounted rate. I'm not sure of that,</p> <p>7 but yes, I do recall seeing a spreadsheet to that effect.</p> <p>8 Q Okay.</p> <p>9 You anticipated my next question: As you sit</p> <p>10 here today, Free Speech Systems is not prepared to</p> <p>11 testify as to whether it offers the same advertising</p> <p>12 rates to PQPR that it offers to third-party advertisers;</p> <p>13 correct?</p> <p>14 A Right. I don't know. I would have to get a</p> <p>15 copy of the spreadsheet.</p> <p>16 Q Okay.</p> <p>17 And the spreadsheet that you're describing is</p> <p>18 one that Mr. Roe showed you but that you did not retain a</p> <p>19 copy of; correct?</p> <p>20 A Right, he didn't send it to me.</p> <p>21 Q And you described it as a spreadsheet showing</p> <p>22 how Free Speech Systems calculates it's advertising fees?</p> <p>23 A Right. How it would bill at least PQPR for the</p> <p>24 advertising. So, if I recall correctly, it's a cost for</p> <p>25 the banner. So, like, if it's a banner ad, the cost for</p>
<p style="text-align: right;">Page 710</p> <p>1 A Have I -- no, I have not asked for any ledgers</p> <p>2 or from invoices. Like I said, when I spoke to Bob on</p> <p>3 this particular topic, I believe he showed me what looked</p> <p>4 like a spreadsheet of how much each ad costs as is billed</p> <p>5 to PQPR. But other than that, I didn't see any invoices,</p> <p>6 no.</p> <p>7 Q Other than PQPR, did Free Speech Systems accept</p> <p>8 credits from any other third-party advertiser that bought</p> <p>9 advertising from it?</p> <p>10 A Accept credits? No, I don't believe so. I</p> <p>11 think we were paid for our advertising.</p> <p>12 Q With the exception of PQPR?</p> <p>13 A I believe so, yes.</p> <p>14 THE WITNESS: I'm sorry, is now a good</p> <p>15 time for a bathroom break?</p> <p>16 MR. MATTEI: I'm sorry, yes.</p> <p>17 THE VIDEOGRAPHER: We are off the record.</p> <p>18 The time is 3:10 p.m.</p> <p>19 (Recess from 3:10 p.m. to 3:19 p.m.)</p> <p>20 THE VIDEOGRAPHER: We are now on the</p> <p>21 record. The time is 3:19.</p> <p>22 BY MR. MATTEI:</p> <p>23 Q Ms. Paz, before the break, you testified that</p> <p>24 you had had a conversation with Mr. Roe in which Mr. Roe</p> <p>25 described for you the formula for -- the formula that</p>	<p style="text-align: right;">Page 712</p> <p>1 that ad. In certain circumstances, it would be pay per</p> <p>2 click and how much money it would be per click. But I</p> <p>3 just don't have those figures.</p> <p>4 Q And are you prepared to testify for what period</p> <p>5 of time Free Speech Systems used that particular formula</p> <p>6 as set out in that spreadsheet to charge PQPR?</p> <p>7 A No, I don't know what time period that was.</p> <p>8 MR. MATTEI: So that's another document.</p> <p>9 I'm sure that we don't have that, Zach.</p> <p>10 MR. REILAND: Okay.</p> <p>11 Chris, I'm sorry, can you summarize what</p> <p>12 the next document is that you're looking for?</p> <p>13 MR. MATTEI: Sure. What Ms. Paz described</p> <p>14 as a spreadsheet that Mr. Roe showed her</p> <p>15 purporting to describe the way in which Free</p> <p>16 Speech Systems calculated advertising fees it</p> <p>17 charged to PQPR.</p> <p>18 MR. REILAND: Got it.</p> <p>19 BY MR. MATTEI:</p> <p>20 Q I take it from your testimony, although you</p> <p>21 didn't say this expressly, that you understood that</p> <p>22 spreadsheet to be specific to rates charged to PQPR; not</p> <p>23 necessarily other third-party advertisers; right?</p> <p>24 A That's how I took it.</p> <p>25 Q Okay.</p>

June 27, 2022

<p style="text-align: right;">Page 713</p> <p>1 A What we're charging other people would be</p> <p>2 listed in the advertising income spreadsheets that we</p> <p>3 produced to you.</p> <p>4 Q You're charging them, but the formula you used</p> <p>5 to reach those rates is not included?</p> <p>6 A I don't know if it's the same rate, right.</p> <p>7 Q You just don't know?</p> <p>8 A I'm not sure.</p> <p>9 MR. MATTEI: So, I think that that is all</p> <p>10 I have. I know Attorney Cerame's going to have</p> <p>11 some questions.</p> <p>12 So, Mario, if you're ready, we can go</p> <p>13 ahead and begin.</p> <p>14 THE WITNESS: Is he there?</p> <p>15 MR. MATTEI: I wonder if he just didn't</p> <p>16 come back after the break.</p> <p>17 MR. REILAND: He might have thought we</p> <p>18 were going to go longer than this. I'm going</p> <p>19 to shoot him a text.</p> <p>20 MR. MATTEI: Here he is.</p> <p>21 Mario, before you begin, is it possible</p> <p>22 for me to get audio -- I will get audio through</p> <p>23 that no matter what. Because I'm about to lose</p> <p>24 my power on my computer; all right.</p> <p>25 MR. CERAME: You're all done?</p>	<p style="text-align: right;">Page 715</p> <p>1 None come to mind, though, right?</p> <p>2 A No.</p> <p>3 Q And we both participated in the defense</p> <p>4 appellate clinic, but in different years; right?</p> <p>5 A Yes.</p> <p>6 Q So -- since graduation, aside from 2022, it's</p> <p>7 fair to say we have not interacted very much?</p> <p>8 A I don't recall any conversations with you prior</p> <p>9 to this year --</p> <p>10 Q Okay.</p> <p>11 A -- after graduation.</p> <p>12 Q Okay. That's great. Perfect. Perfect.</p> <p>13 In April 2022, a mutual colleague of ours sent</p> <p>14 you my way for first amendment advice on a particular</p> <p>15 case; right?</p> <p>16 A Yes. I'm a member of the Connecticut Criminal</p> <p>17 Defense Lawyers Association and I put out an inquiry</p> <p>18 because I had a potential first amendment issue and he</p> <p>19 re-directed me your way to see if you had any draft</p> <p>20 motions that I could take a look at.</p> <p>21 Q Aside from that, I have never offered you legal</p> <p>22 advice or support or sent a referral of a case to you;</p> <p>23 right?</p> <p>24 A Correct.</p> <p>25 Q You do not refer cases to me on a regular</p>
<p style="text-align: right;">Page 714</p> <p>1 MR. MATTEI: Yes.</p> <p>2 MR. CERAME: Oh, even less than I thought.</p> <p>3 I thought you were going to have at least a few</p> <p>4 minutes. My goodness. Let me pull up my</p> <p>5 notes.</p> <p>6 EXAMINATION BY MR. CERAME:</p> <p>7 Q Attorney Paz, as you know, my name is Mario</p> <p>8 Cerame. I represent Genesis Communication Network,</p> <p>9 Incorporated in this action.</p> <p>10 First off, I want to talk about how we know</p> <p>11 each other because there were a lot of questions on</p> <p>12 direct about how you knew Norm Pattis and so -- we went</p> <p>13 to law school together; right?</p> <p>14 A Yes.</p> <p>15 Q We were in the same class -- actual class of</p> <p>16 2012; right?</p> <p>17 A Yes, we were.</p> <p>18 Q We were not in the same section?</p> <p>19 A I don't believe we were.</p> <p>20 Q Right.</p> <p>21 So, do you remember whether we had any classes</p> <p>22 together aside from the clinic?</p> <p>23 A Definitely not the first two years, maybe the</p> <p>24 third year.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 716</p> <p>1 basis?</p> <p>2 A I don't think I've ever referred you a case.</p> <p>3 Q Perfect.</p> <p>4 Thank you.</p> <p>5 So, first, I want to talk briefly about some of</p> <p>6 the things that were discussed today. First, I want to</p> <p>7 talk about the audience size questions that you answered.</p> <p>8 A Sure.</p> <p>9 Q You indicated when there were questions about</p> <p>10 the estimation of -- about these estimations, for</p> <p>11 example, the estimate that Alex -- you read an estimate</p> <p>12 today saying that Alex estimated his audience on a Sunday</p> <p>13 afternoon, his radio audience was two million.</p> <p>14 A That was in the transcript to one of his</p> <p>15 videos, yes.</p> <p>16 Q Right. You don't know what methodology he used</p> <p>17 to arrive at that number?</p> <p>18 A No, I don't know what he's citing there.</p> <p>19 Q You don't know whether he used any kind of</p> <p>20 scientific method to arrive at the number?</p> <p>21 MR. MATTEI: Objection.</p> <p>22 BY THE WITNESS:</p> <p>23 A No, I don't.</p> <p>24 Q Do you know -- do you have an idea of how</p> <p>25 audience size is determined in the radio industry?</p>

June 27, 2022

<p style="text-align: right;">Page 717</p> <p>1 A Based on my conversations with Alex, his</p> <p>2 position was he makes these estimations just by how many</p> <p>3 radio stations he is broadcast on; and if you go to those</p> <p>4 stations' websites, it will list their -- how many</p> <p>5 people, in estimation, they reach. And he estimates it</p> <p>6 often that way much but it's really difficult to do that</p> <p>7 because, like I said earlier, he's online, he's free to</p> <p>8 air; so, pretty much anyone anywhere can listen to his</p> <p>9 broadcast.</p> <p>10 Q Attorney Paz, do you know whether that</p> <p>11 methodology is common in the industry, that is to be more</p> <p>12 particular, the methodology of looking at what is</p> <p>13 reported by radio stations to be their audience and</p> <p>14 coming up with some composite number based on that</p> <p>15 number, is that how the industry, how generally radio</p> <p>16 stations in the industry calculate their audience? Do</p> <p>17 you know whether that's true?</p> <p>18 A That's my understanding based on my</p> <p>19 conversation with Mr. Jones.</p> <p>20 Q So, aside from Mr. Jones, have you had any</p> <p>21 conversations with anyone else about determining audience</p> <p>22 size?</p> <p>23 A I don't believe so, no.</p> <p>24 Q Okay.</p> <p>25 No one else -- certainly, no one else at your</p>	<p style="text-align: right;">Page 719</p> <p>1 Mr. Jones, do you have any information in your -- as Free</p> <p>2 Speech Systems, as to what the audience size has been</p> <p>3 over the last years?</p> <p>4 MR. MATTEI: Objection.</p> <p>5 BY THE WITNESS:</p> <p>6 A No, I don't have any information to affirm or</p> <p>7 deny those numbers.</p> <p>8 Q Okay.</p> <p>9 So, as far as you know, the number is a</p> <p>10 guess?</p> <p>11 MR. MATTEI: Objection.</p> <p>12 BY THE WITNESS:</p> <p>13 A I don't know what those numbers are based on.</p> <p>14 It could be, you know, in my conversations with Alex,</p> <p>15 Alex tends to exaggerate things sometimes. It could be</p> <p>16 an exaggeration. It could be based on Quantcast numbers,</p> <p>17 it could be based on some other numbers some other</p> <p>18 places. I don't know what it's based on.</p> <p>19 Q You mentioned Quantcast. What is Quantcast, if</p> <p>20 you know?</p> <p>21 A So, Quantcast came up a couple times and it</p> <p>22 appears to be some type of attempt to break down</p> <p>23 viewership in terms of demographics. So, I know there</p> <p>24 were a lot of questions about Quantcast data whether we</p> <p>25 use Quantcast data as far as the marketing. So, that's</p>
<p style="text-align: right;">Page 718</p> <p>1 client -- or I should say not your client -- certainly no</p> <p>2 one else at Free Speech Systems indicated to you how they</p> <p>3 calculate audience size?</p> <p>4 A No one else besides Mr. Jones? No.</p> <p>5 Q We also saw a document by Mr. John Tracy. Do</p> <p>6 you remember that document? It was an e-mail?</p> <p>7 A Oh, the e-mail to Mr. Tracy?</p> <p>8 Q I thought it was an e-mail from him. But if</p> <p>9 you remember it more correctly. It was an e-mail that</p> <p>10 Mr. Tracy was involved in the conversation?</p> <p>11 A Yes, yes.</p> <p>12 Q And there was submitted that there was an</p> <p>13 audience size number in the electronic media?</p> <p>14 A Yes, I recall that. Yes.</p> <p>15 Q You were asked the question if you had any</p> <p>16 reason to doubt that number and you answered that you did</p> <p>17 not.</p> <p>18 A I don't have any information in my possession</p> <p>19 to contradict the number.</p> <p>20 Q Do you have new information in your possession</p> <p>21 to affirm the number?</p> <p>22 A No.</p> <p>23 Q So, that sort of question was asked several</p> <p>24 times about calculations of audience size. Do you have</p> <p>25 any information -- aside from conversations had you with</p>	<p style="text-align: right;">Page 720</p> <p>1 my understanding of what it is.</p> <p>2 Q With whom at Free Speech Systems did you</p> <p>3 discuss that?</p> <p>4 A Given the questions in the notice of</p> <p>5 deposition, I asked Blake Roddy because he's currently in</p> <p>6 that position of in advertising and marketing.</p> <p>7 Q What did he say about that data?</p> <p>8 A Basically, his position was that it's been</p> <p>9 available but they never used it in terms of their</p> <p>10 marketing strategies. That it was available for</p> <p>11 production, but the only time they've ever logged in to</p> <p>12 get it was in connection with this litigation and maybe a</p> <p>13 couple of times if somebody asked him for it. But he</p> <p>14 never integrated it into the marketing strategies.</p> <p>15 Q Did he share with you his opinion about it's</p> <p>16 reliability?</p> <p>17 MR. MATTEI: Objection.</p> <p>18 BY THE WITNESS:</p> <p>19 A No, he didn't.</p> <p>20 Q Did he tell why you they don't regularly use</p> <p>21 that data?</p> <p>22 A It's just not something that they did. It's</p> <p>23 not how they -- it's not how they do advertising.</p> <p>24 Q I understand that. And I have reasons why I</p> <p>25 might think that's true.</p>

June 27, 2022

<p style="text-align: right;">Page 721</p> <p>1 Did he give you any indication, though, about</p> <p>2 why Free Speech Systems doesn't regularly or did not</p> <p>3 regularly use that data, except when it came to this</p> <p>4 lawsuit?</p> <p>5 MR. MATTEI: Objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A I mean, it seemed to me that their way of</p> <p>8 advertising was doing well and it didn't seem to me like</p> <p>9 they needed or wanted had. So, when I asked these</p> <p>10 questions, he basically said that they have -- they use a</p> <p>11 variety of different methods for retargeting, Google ads,</p> <p>12 Bing ads, things like that. They also have a newsletter</p> <p>13 from which they derive business, so it just -- from my</p> <p>14 conversation with him, it's just not something they</p> <p>15 needed and so they didn't use it.</p> <p>16 Q Thank you for your answer. I'm sorry. Perhaps</p> <p>17 I'm not asking -- let me try a different way to approach</p> <p>18 the question.</p> <p>19 Does Free Speech Systems have an opinion about</p> <p>20 the reliability of that data?</p> <p>21 MR. MATTEI: Objection.</p> <p>22 BY MR. CERAME:</p> <p>23 Q It's a yes/no?</p> <p>24 A No, I haven't had any conversations with</p> <p>25 anybody about the reliability or the opinions on the</p>	<p style="text-align: right;">Page 723</p> <p>1 Q Mr. Tracy, who seems to be the origin of the --</p> <p>2 of one of the estimations, he is not an employee of</p> <p>3 Genesis Communication Network to your knowledge; correct?</p> <p>4 MR. MATTEI: Objection.</p> <p>5 BY THE WITNESS:</p> <p>6 A Is James Tracy an employee of Genesis?</p> <p>7 Q Mr. Tracy.</p> <p>8 A Okay, no, I don't believe he is an employee of</p> <p>9 Genesis.</p> <p>10 Q Just making sure.</p> <p>11 Do you know whether there's been any</p> <p>12 coordination or collaboration between Free Speech Systems</p> <p>13 and Genesis Communication Network or Ted Anderson as to</p> <p>14 determining audience size?</p> <p>15 A No, I'm not aware of any such communications.</p> <p>16 Q There was also discussion of a video and</p> <p>17 audience size vis-a-vis some video. Do you know whether</p> <p>18 there's any scientifically determined link between</p> <p>19 audience size on a video and audience size on the radio?</p> <p>20 MR. MATTEI: Objection.</p> <p>21 BY THE WITNESS:</p> <p>22 A No.</p> <p>23 And I will just say that it's hard to tell</p> <p>24 audience size when a video is posted because that's just</p> <p>25 based on the number of views. One person can view it</p>
<p style="text-align: right;">Page 722</p> <p>1 reliability of it. So, no.</p> <p>2 Q So, Free Speech Systems does not have an</p> <p>3 opinion on whether the data is reliable or not?</p> <p>4 MR. MATTEI: Objection.</p> <p>5 BY THE WITNESS:</p> <p>6 A No.</p> <p>7 Q No, it does not have an opinion; correct? I'm</p> <p>8 sorry.</p> <p>9 A That's correct.</p> <p>10 Q Okay.</p> <p>11 And -- but, nonetheless, notwithstanding the</p> <p>12 fact they do not have an opinion at this time, they do</p> <p>13 not use the data?</p> <p>14 A That's correct.</p> <p>15 Q Okay.</p> <p>16 Do you know whether any other radio programs</p> <p>17 use that data?</p> <p>18 MR. MATTEI: Objection.</p> <p>19 BY THE WITNESS:</p> <p>20 A I don't.</p> <p>21 Q Do you know whether that data is relied on as</p> <p>22 an industry standard?</p> <p>23 MR. MATTEI: Objection.</p> <p>24 BY THE WITNESS:</p> <p>25 A No, I don't.</p>	<p style="text-align: right;">Page 724</p> <p>1 numerous times. So, just because you have a number of</p> <p>2 views on the YouTube -- on, like, a YouTube video or a</p> <p>3 link that's posted to a video, doesn't mean that that's</p> <p>4 the number of people that have viewed it. So, I don't</p> <p>5 think there's a correlation between the two.</p> <p>6 Q Okay.</p> <p>7 Just because you didn't have a reason to</p> <p>8 dispute the numbers that were proffered today doesn't</p> <p>9 mean that you have a reason to find them accurate?</p> <p>10 MR. MATTEI: Objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A Right, I'm not subscribing to the numbers. I</p> <p>13 don't know either way.</p> <p>14 Q Is Genesis Communication Network an affiliate,</p> <p>15 as you used the term earlier today?</p> <p>16 MR. MATTEI: Objection.</p> <p>17 BY THE WITNESS:</p> <p>18 A I don't think I used the term "affiliate," I</p> <p>19 think Attorney Mattei used the term "affiliate." But I</p> <p>20 think that our shows are broadcast through Genesis</p> <p>21 Communications. So, however Attorney Mattei was using</p> <p>22 it.</p> <p>23 Q So, do you know whether -- what is Genesis</p> <p>24 Communication Network as Free Speech Systems knows it?</p> <p>25 A It is a platform over which we broadcast the</p>

June 27, 2022

<p style="text-align: right;">Page 725</p> <p>1 show. So, our shows.</p> <p>2 Q Is it currently being done through your show?</p> <p>3 Sorry. Strike that entirely.</p> <p>4 Is Free Speech Systems currently using Genesis</p> <p>5 Communication Network as a platform?</p> <p>6 A Currently?</p> <p>7 Q Yes.</p> <p>8 A I believe so.</p> <p>9 Q Okay.</p> <p>10 You said you do believe so or you don't?</p> <p>11 A I do believe so.</p> <p>12 Q And do you know how many radio shows Genesis</p> <p>13 Communication Network is such a platform for?</p> <p>14 A I'm sorry, I don't.</p> <p>15 Q Do you have an idea?</p> <p>16 A I'm sure very many. We are not the only ones.</p> <p>17 Q Why do you say you're sure there are very many?</p> <p>18 A I know Genesis is a very large company and they</p> <p>19 broadcast a lot of shows.</p> <p>20 Q Do you know whether Genesis Communication</p> <p>21 Network has a transmitter that it broadcasts radio</p> <p>22 directly to listeners?</p> <p>23 A I don't know. I have no idea.</p> <p>24 Q Okay.</p> <p>25 So, you don't know any radio stations that</p>	<p style="text-align: right;">Page 727</p> <p>1 Systems does know about the services Genesis provides?</p> <p>2 A Aside from it being a platform by which we can</p> <p>3 broadcast the show, not very much.</p> <p>4 Q Do you know whether it does anything in terms</p> <p>5 of sound production?</p> <p>6 A I don't know.</p> <p>7 Q Do you know anything about the economic</p> <p>8 relationship in terms of payments or structures of</p> <p>9 payments between Ted Anderson and Genesis and Free Speech</p> <p>10 Systems and Alex Jones and any combination of them?</p> <p>11 MR. MATTEI: Objection.</p> <p>12 BY THE WITNESS:</p> <p>13 A Aside from what's in the general ledgers as</p> <p>14 payments being made or if there are any payments being</p> <p>15 made from Free Speech Systems to Genesis, then no.</p> <p>16 Q Aside from the platform agreement, do you know</p> <p>17 of any other agreement between Genesis Communication</p> <p>18 Network and Free Speech Systems and Alex Jones?</p> <p>19 A No.</p> <p>20 Q Aside from this platform agreement, as you</p> <p>21 described it, platform service, do you know of any</p> <p>22 agreements between Ted Anderson and Free Speech Systems</p> <p>23 or Alex Jones?</p> <p>24 A No.</p> <p>25 Q What does Free Speech Systems know about Ted</p>
<p style="text-align: right;">Page 726</p> <p>1 are -- that Genesis Communication Network operates?</p> <p>2 MR. MATTEI: Objection.</p> <p>3 BY THE WITNESS:</p> <p>4 A No, I don't know how many other stations they</p> <p>5 operate or how many other programs they operate.</p> <p>6 Q You don't even know if they do operate any</p> <p>7 radio stations; correct?</p> <p>8 A I don't know much about Genesis, to be honest.</p> <p>9 Q Very well.</p> <p>10 Who owns The Alex Jones Show? If Free Speech</p> <p>11 Systems knows.</p> <p>12 A Well, Free Speech Systems broadcasts The Alex</p> <p>13 Jones Show and Free Speech Systems is owned by Alex</p> <p>14 Jones. So, Alex owns it.</p> <p>15 Q Does anyone else have an ownership interest in</p> <p>16 it to your knowledge?</p> <p>17 A Not to my knowledge.</p> <p>18 Q I'm looking through some of my notes and some</p> <p>19 of the questions seemed to be good at the time.</p> <p>20 Inasmuch as Genesis -- Let's assume for a</p> <p>21 moment Genesis provides a service for Free Speech</p> <p>22 Systems, do you know anything about the services it</p> <p>23 provides?</p> <p>24 A Minimally.</p> <p>25 Q Can you tell me what you -- what Free Speech</p>	<p style="text-align: right;">Page 728</p> <p>1 Anderson, as you sit here?</p> <p>2 A I don't know very much about Ted Anderson, to</p> <p>3 be honest.</p> <p>4 Q Give me a synopsis of what you do know?</p> <p>5 A Aside from him owning the company, owning</p> <p>6 Genesis, I don't know anything else about him.</p> <p>7 Q Do you know anything about business</p> <p>8 relationships between -- in the past, between Ted, in</p> <p>9 particular, and Alex Jones or Free Speech Systems?</p> <p>10 A You mean, aside from the platform agreement?</p> <p>11 Aside from the platform agreement.</p> <p>12 Q Yes?</p> <p>13 A No.</p> <p>14 Q Do you know anything about Ted's relationship</p> <p>15 to Midas Resources, a different company?</p> <p>16 A No.</p> <p>17 Q You don't know anything about any personal</p> <p>18 deals between Alex Jones and Ted Anderson?</p> <p>19 A If there are any, I wouldn't know.</p> <p>20 Q Do you know whether Ted Anderson and Alex Jones</p> <p>21 are social friends?</p> <p>22 A I don't know that and I didn't ask Alex that.</p> <p>23 Q That's fine.</p> <p>24 Do you know anything about if they have been</p> <p>25 business -- I may already asked you that. You don't know</p>

June 27, 2022

<p style="text-align: right;">Page 729</p> <p>1 anything about any of their business relationships with</p> <p>2 one another; correct?</p> <p>3 A I don't know if they've ever had any aside from</p> <p>4 this platform agreement. I don't know anything about</p> <p>5 their relationship.</p> <p>6 Q Okay.</p> <p>7 Does Free Speech Systems know about my client,</p> <p>8 Genesis Communication Network?</p> <p>9 A Didn't we already talk about that?</p> <p>10 Q I know I asked you about Ted and -- but -- so</p> <p>11 perhaps you did. If you could -- this may be one of my</p> <p>12 last questions.</p> <p>13 A Okay.</p> <p>14 Q I'm trying to wrap it up, if you will?</p> <p>15 A All right.</p> <p>16 Q Let me ask you again: What does Free Speech</p> <p>17 Systems know about my client, Genesis Communication</p> <p>18 Network?</p> <p>19 A Aside from the fact that we have --</p> <p>20 Q Aside from the platform agreement?</p> <p>21 A Aside from the platform agreements and that you</p> <p>22 provide a platform by which we could broadcast the shows,</p> <p>23 the various shows, I don't know very much about it.</p> <p>24 Q That is the sum of it?</p> <p>25 A That is the sum of it, yes.</p>	<p style="text-align: right;">Page 731</p> <p>1 Alex and all the other employees. So, they were not --</p> <p>2 Genesis was not involved, Mr. Anderson was not involved.</p> <p>3 They have their own internal process on how they do that.</p> <p>4 MR. CERAME: That's it. That's all I</p> <p>5 have. That's all the questions I have.</p> <p>6 MR. MATTEI: Just a few more.</p> <p>7 EXAMINATION BY MR. MATTEI:</p> <p>8 Q Ms. Paz, are you aware, other than the two --</p> <p>9 A I know. It's late in the day.</p> <p>10 Q Other than the two promissory notes that we've</p> <p>11 reviewed, one dated August 2020 and another dated</p> <p>12 November 2021, is Free Speech Systems aware of any other</p> <p>13 written agreements between Free Speech Systems and PQPR?</p> <p>14 A Written agreements, no. And I did inquire of</p> <p>15 Mr. Roe to make sure that those two agreements were the</p> <p>16 only written agreements that we have and those were the</p> <p>17 only two written agreements.</p> <p>18 Q Okay.</p> <p>19 So, there are no management agreements between</p> <p>20 Free Speech Systems and PQPR; correct?</p> <p>21 A No. One of the big problems with, you know,</p> <p>22 Free Speech, in general, which was being tried to rectify</p> <p>23 is that a vast majority of the policies are not reduced</p> <p>24 to writing and had not been reduced to writing.</p> <p>25 Q I'm not talking about Free Speech Systems</p>
<p style="text-align: right;">Page 730</p> <p>1 Q Okay.</p> <p>2 Do you know whether Genesis Communication</p> <p>3 Network, in part of its work, does anything with</p> <p>4 satellites?</p> <p>5 A I'm not sure.</p> <p>6 Q Okay.</p> <p>7 A And I don't want to guess.</p> <p>8 Q That's fine.</p> <p>9 Do you know anything about -- you don't know,</p> <p>10 you do not know anything about whether Ted Anderson has</p> <p>11 ever exercised editorial control over any of Free Speech</p> <p>12 Systems's content?</p> <p>13 A I mean, I don't believe, based on any of my</p> <p>14 communications that anyone outside of Free Speech</p> <p>15 Systems, had anything to say about the content on -- that</p> <p>16 was being produced. Just based on my conversations with</p> <p>17 Alex, the other employees and the process by which the</p> <p>18 content is produced. So, I don't think that Mr. Anderson</p> <p>19 would have had any say in any of that.</p> <p>20 Q Similarly, your response would apply equally to</p> <p>21 Genesis Communication Network, the company, not just to</p> <p>22 Ted. Genesis also did not have such control or -- ever?</p> <p>23 A That's correct, just based on the process by</p> <p>24 which they were going about making -- creating this</p> <p>25 content on a daily basis, based on my communications with</p>	<p style="text-align: right;">Page 732</p> <p>1 policies, I'm talking specifically about the relationship</p> <p>2 between two corporate entities?</p> <p>3 A Right.</p> <p>4 Q Free Speech Systems and PQPR. And the answer</p> <p>5 to the question as to whether or not there's any sort of</p> <p>6 management agreement between Free Speech Systems and PQPR</p> <p>7 is no?</p> <p>8 A Yes, I don't have anything beside from those</p> <p>9 notes.</p> <p>10 Q So, Free Speech Systems isn't in possession of</p> <p>11 any written agreements governing the relationship between</p> <p>12 Free Speech Systems and PQPR, other than the two</p> <p>13 promissory notes we reviewed today; correct?</p> <p>14 A Right.</p> <p>15 Q I did look through the text messages and</p> <p>16 e-mails that Attorney Reiland produced between you and</p> <p>17 Free Speech Systems' employees. You referred to an</p> <p>18 individual named Jay in text message with Mr. Jones. Who</p> <p>19 is Jay?</p> <p>20 A Jay Blott.</p> <p>21 Q Jay is short or Jacqueline Blott?</p> <p>22 A She goes by Jay.</p> <p>23 MR. MATTEI: Can you just bring up those</p> <p>24 text messages, Pritika, if you don't mind.</p> <p>25 My video stopped working. Let me know</p>

June 27, 2022

<p style="text-align: right;">Page 733</p> <p>1 when they're up.</p> <p>2 BY MR. MATTEI:</p> <p>3 Q Can you scroll down to the text messages with</p> <p>4 Alex Jones, which I believe are on about page 7. And you</p> <p>5 see, Ms. Paz, that the text message appear to be screen</p> <p>6 grabs which you then e-mailed to Attorney Pattis; is that</p> <p>7 right?</p> <p>8 A Yes, these are my screen shots.</p> <p>9 Q So you just did the screen grab on your iPhone</p> <p>10 and sent them as JPEGs to Mr. Pattis?</p> <p>11 A Correct.</p> <p>12 Q And on February 13th, Mr. Jones texted you</p> <p>13 asking to get a late lunch; correct?</p> <p>14 A Yes. This was the day before I had the Texas</p> <p>15 deposition scheduled.</p> <p>16 Q Okay.</p> <p>17 And so did you and Mr. Jones go out for</p> <p>18 lunch?</p> <p>19 A No. We ended up having a phone conference, me,</p> <p>20 him and Attorney Pattis.</p> <p>21 Q If you scroll down to the point in the text</p> <p>22 exchange where you and Mr. Jones are discussing getting</p> <p>23 lunch. Do you see after you say, We can do whatever, I'm</p> <p>24 open, just let me know what time and we can meet you?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 735</p> <p>1 Q Did you also want to check with Mr. Jones to</p> <p>2 make sure that the information that you had obtained and</p> <p>3 intended to testify to was accurate as far as he was</p> <p>4 concerned?</p> <p>5 A I did verify a couple things with him, you</p> <p>6 know, if I had spoken to one employee and this person</p> <p>7 said this, is this accurate. I mean, I did have a</p> <p>8 conversation with him outside of that phone conversation.</p> <p>9 I met him in person and we went over a lot of that stuff,</p> <p>10 too.</p> <p>11 Q Prior to your deposition?</p> <p>12 A Prior to -- because I was down there for about</p> <p>13 a week.</p> <p>14 Q Let's focus though on this particular series of</p> <p>15 text messages on February 13th. Did you, in fact, then</p> <p>16 meet with him before your deposition the next day?</p> <p>17 A No, we had a telephone conference.</p> <p>18 Q If you scroll down further, it has another</p> <p>19 voice memo that Mr. Jones left you that, at least</p> <p>20 according to this text message screen grab, appears to</p> <p>21 have been about 15 seconds; correct?</p> <p>22 A That's what it looks like.</p> <p>23 MR. MATTEI: We'll need that as well.</p> <p>24 MR. REILAND: What is it?</p> <p>25 BY THE WITNESS:</p>
<p style="text-align: right;">Page 734</p> <p>1 Q And Mr. Jones then texted you a voice memo;</p> <p>2 correct?</p> <p>3 A Yes.</p> <p>4 Q That voice memo has not been produced to us.</p> <p>5 You still have it on your phone; right?</p> <p>6 A Probably.</p> <p>7 Q Okay.</p> <p>8 I would ask that you send that to Attorney</p> <p>9 Reiland for production.</p> <p>10 What did the voice mail say essentially; do you</p> <p>11 recall.</p> <p>12 A I think he was talking about it being a problem</p> <p>13 getting to meet for lunch for whatever reason. I think</p> <p>14 he had some personal issues going on. So, that's why I</p> <p>15 said do you just want to do a three-way and I want him --</p> <p>16 I wanted to make sure that he was comfortable with, you</p> <p>17 know, where I was before the deposition tomorrow.</p> <p>18 Q Okay.</p> <p>19 Meaning, you wanted to make sure Mr. Jones was</p> <p>20 comfortable with what you planned to testify about at the</p> <p>21 deposition the next day?</p> <p>22 A Well, comfortable in a sense that, you know, I</p> <p>23 understood the structure of the company, I understood the</p> <p>24 material, that, you know, that I was prepared.</p> <p>25 Essentially.</p>	<p style="text-align: right;">Page 736</p> <p>1 A Hopefully I can figure out how to get those in</p> <p>2 an e-mail. I'm not very technologically savvy. I'll</p> <p>3 figure it out.</p> <p>4 Q Do you have your phone with you right now?</p> <p>5 A Yeah.</p> <p>6 Q Do you want to just play them into the record?</p> <p>7 A Let's see if I can find them and then we will</p> <p>8 see.</p> <p>9 Yeah, I still have them.</p> <p>10 Q Okay.</p> <p>11 So, why don't we play the first one, 21 second.</p> <p>12 Do you see the one Ms. Paz, Sunday, February 13th at</p> <p>13 12:08 p.m.?</p> <p>14 A Yep.</p> <p>15 Q Okay.</p> <p>16 Is that the one that you intend to play right</p> <p>17 now?</p> <p>18 A Yes.</p> <p>19 Q Go ahead.</p> <p>20 RECORDING: Hey, Brittany, maybe we</p> <p>21 can go all go out and get dinner tomorrow</p> <p>22 night. I have some family stuff that I</p> <p>23 forgot I have to take care of. I just</p> <p>24 wanted to actually, you know, talk to you a</p> <p>25 little bit more about some ideas I've got</p>

June 27, 2022

<p style="text-align: right;">Page 737</p> <p>1 but I know you're meeting with Norm coming</p> <p>2 up about an hour and a half. So, how about</p> <p>3 I just call you towards the end of that</p> <p>4 conversation and we can have a discussion</p> <p>5 with Norm. Thank you. I really appreciate</p> <p>6 you coming on down and taking on this</p> <p>7 difficult job.</p> <p>8 We can do it with Norm right up</p> <p>9 front at noon --</p> <p>10 BY THE WITNESS:</p> <p>11 A Sorry, that was the second one that just</p> <p>12 started playing automatically. Do you want me to start</p> <p>13 over?</p> <p>14 Q Yes, I do. But hold on a second.</p> <p>15 That exhibit we just played will be the next</p> <p>16 exhibit in sequence and then we'll just have you provide</p> <p>17 us with whatever audio file of it for the record?</p> <p>18 MR. REILAND: Do you want me to still send</p> <p>19 them to you?</p> <p>20 MR. MATTEI: Yeah.</p> <p>21 MR. REILAND: Okay.</p> <p>22 MR. MATTEI: And we'll get that from the</p> <p>23 court reporter as well. That will be Exhibit</p> <p>24 number?</p> <p>25 MS. SESHADRI: 129.</p>	<p style="text-align: right;">Page 739</p> <p>1 forward to that. Just find out. Thanks.</p> <p>2 THE WITNESS: And that's it.</p> <p>3 MR. MATTEI: That will be Exhibit 130.</p> <p>4 (Plaintiff's Exhibit 130 was</p> <p>5 marked for identification: Audio file.)</p> <p>6 MR. MATTEI: Okay, that's all I have.</p> <p>7 I want to put something on the record, but</p> <p>8 Mario, do you have any re-cross?</p> <p>9 MR. CERAME: I do, I do.</p> <p>10 EXAMINATION BY MR. CERAME:</p> <p>11 Q It's really only one piece that was a</p> <p>12 discussion about agreements not being reduced to writing.</p> <p>13 I would ask if that's -- if your sense is that's very</p> <p>14 common for agreements -- business agreements, even</p> <p>15 substantial business agreements, to not be reduced to</p> <p>16 writing --</p> <p>17 MR. MATTEI: Objection.</p> <p>18 BY MR. CERAME:</p> <p>19 Q -- between Free Speech Systems or between Alex</p> <p>20 and someone else?</p> <p>21 MR. MATTEI: Objection.</p> <p>22 BY THE WITNESS:</p> <p>23 A I think it's very common in this particular</p> <p>24 situation with this company and with Mr. Jones, in</p> <p>25 particular. And it's what I have kind of seen about the</p>
<p style="text-align: right;">Page 738</p> <p>1 (Plaintiff's Exhibit 129 was</p> <p>2 marked for identification: Audio file.)</p> <p>3 BY MR. MATTEI:</p> <p>4 Q Why don't we play the next one which was sent,</p> <p>5 according to this screen grab at least, at February --</p> <p>6 RECORDING: Or we can do it toward</p> <p>7 Sandy --</p> <p>8 BY THE WITNESS:</p> <p>9 A Sorry. I just -- I can't figure out how to</p> <p>10 start it over.</p> <p>11 Q All right.</p> <p>12 Anyway, what you are trying to do, Ms. Paz, is</p> <p>13 play the 15 second --</p> <p>14 A I might to have to just let it cycle through</p> <p>15 and start over.</p> <p>16 RECORDING: Go get lunch. Look</p> <p>17 forward to that. Just --</p> <p>18 THE WITNESS: Okay, so I'll play it again</p> <p>19 and just tell me when you're ready.</p> <p>20 MR. MATTEI: I am ready.</p> <p>21 RECORDING: We can do it with Norm</p> <p>22 right up front at noon or we can do it</p> <p>23 towards the end your call. I just have to</p> <p>24 take care of some family stuff later today,</p> <p>25 so I could go get lunch. I was looking</p>	<p style="text-align: right;">Page 740</p> <p>1 structure, lack thereof and hierarchy and organization of</p> <p>2 the business as a whole. Just based on the time I've</p> <p>3 spent interviewing people and going down there and</p> <p>4 spending time with everybody.</p> <p>5 So, I do, in this particular circumstance,</p> <p>6 think it's common.</p> <p>7 Q Okay.</p> <p>8 And even for a long term business -- Well,</p> <p>9 strike that.</p> <p>10 You would agree that Genesis Communication</p> <p>11 Network and Free Speech Systems or Genesis Communication</p> <p>12 Network and Alex Jones have had a business relationship</p> <p>13 for at least two decades, to the best of your knowledge?</p> <p>14 A To the best of my knowledge, they have an</p> <p>15 ongoing business relationship, yes.</p> <p>16 Q You have no reason to doubt that their business</p> <p>17 relationship has been in excess of 20 years?</p> <p>18 A I don't have any reason to doubt it, no.</p> <p>19 Q Even so, notwithstanding the fact there's been</p> <p>20 a business relationship for more than two decades to the</p> <p>21 best of your knowledge, it's not surprising that there</p> <p>22 are almost no agreements that have been reduced to</p> <p>23 writing?</p> <p>24 MR. MATTEI: Objection.</p> <p>25 BY THE WITNESS:</p>

June 27, 2022

<p style="text-align: right;">Page 741</p> <p>1 A That does not surprise me, no.</p> <p>2 Q And can you tell me about why, if you have an</p> <p>3 understanding, why is that? Why are they not reduced to</p> <p>4 writing?</p> <p>5 MR. MATTEI: Objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A In this -- with, specifically related Free</p> <p>8 Speech? My understanding is just, you know, as I said in</p> <p>9 prior depositions, Alex is a radio personality. He</p> <p>10 doesn't -- he's not very -- he's not a good business</p> <p>11 person. A lot of the issues with the financial</p> <p>12 entanglements we were talking about, the lack of</p> <p>13 hierarchical structure within Free Speech. They</p> <p>14 continued growing and he didn't know how to control it</p> <p>15 and he's a very fly-by-the-seat-your-pants kind of person</p> <p>16 just based on my interactions with him. So, it's just,</p> <p>17 to me, and it's his business, he runs it, he is the sole</p> <p>18 person in charge of it and he just never had any need to</p> <p>19 reduce these things to writing. It was functioning okay</p> <p>20 at the time and so he just -- he just went along with it.</p> <p>21 And then, along the line and they got bigger and bigger</p> <p>22 and bigger it caused more problems. But the</p> <p>23 disorganization and the lack of structure is a very</p> <p>24 common theme that I've seen throughout my entire time</p> <p>25 representing Free Speech.</p>	<p style="text-align: right;">Page 743</p> <p>1 is not very good at the other side of the business</p> <p>2 aspect. Which has caused a lot of issues as we have seen</p> <p>3 in this litigation. There's -- you know, we can't find</p> <p>4 material or it doesn't exist or -- and it should in the</p> <p>5 normal course of what you think of a big business you</p> <p>6 would think it should exist. But it doesn't exist and</p> <p>7 then when we tell people it doesn't exist, they are kind</p> <p>8 of incredulous that it doesn't exist.</p> <p>9 So, that's what you've seen working with Free</p> <p>10 Speech and working with Mr. Jones. I just think he</p> <p>11 doesn't pay much attention to it because he's paying</p> <p>12 attention to his content. That's what he cares about,</p> <p>13 truly.</p> <p>14 Q Okay.</p> <p>15 MR. CERAME: That's what I needed to ask</p> <p>16 about. If you have any re-direct, Chris, I</p> <p>17 would ask that your redirect really actually</p> <p>18 follow from the scope at this point.</p> <p>19 MR. MATTEI: I definitely have some</p> <p>20 redirect.</p> <p>21 EXAMINATION BY MR. MATTEI:</p> <p>22 Q Ms. Paz, you just testified that it's very</p> <p>23 common for Free Speech Systems to enter into unwritten</p> <p>24 agreements. Can you give me a single example of an</p> <p>25 unwritten agreement that Free Speech Systems has entered</p>
<p style="text-align: right;">Page 742</p> <p>1 Q Is it fair to say that Mr. Jones is focused on</p> <p>2 creating content for his programs?</p> <p>3 MR. MATTEI: Objection.</p> <p>4 BY THE WITNESS:</p> <p>5 A I would say that's 100 percent accurate. He</p> <p>6 is -- he has historically been not very involved in the</p> <p>7 financial aspect of it. You know, when I talk to people,</p> <p>8 they'll be like oh, well, every once in a while Alex will</p> <p>9 look at the accounts, he'll see we need -- we'll see</p> <p>10 we're low on money and he'll go to the warehouse see what</p> <p>11 we have in stock and then run an ad. It's very</p> <p>12 fly-by-the-seat-of-your-pants. It's very -- there's very</p> <p>13 little planning. It's just disorganized. He's not a</p> <p>14 very good business person.</p> <p>15 Q Is it fair to say that Mr. Jones's time spent</p> <p>16 in preparing and in doing -- creating content interferes</p> <p>17 with his ability to make a written business agreement and</p> <p>18 that is part of why everything's oral?</p> <p>19 MR. MATTEI: Objection.</p> <p>20 BY THE WITNESS:</p> <p>21 A I don't know if it's a time thing, but it's</p> <p>22 like a lot of attorneys I know, it's very common you</p> <p>23 know, a lot of attorneys I know are excellent attorneys</p> <p>24 and very poor business people and Alex is very good at</p> <p>25 what he does and what he does is create content. And he</p>	<p style="text-align: right;">Page 744</p> <p>1 into and been bound by?</p> <p>2 A So, most of the agreements, like, for example,</p> <p>3 I haven't seen any agreements with any of our people that</p> <p>4 we provide marketing to. I don't know if any of them are</p> <p>5 reduced to writing. We do bill people for our</p> <p>6 third-party marketing. I don't know if they are reduced</p> <p>7 to any form of an agreement.</p> <p>8 Aside from having -- from having employees sign</p> <p>9 certain things associated with their on-boarding process,</p> <p>10 I don't think that there's any really employment</p> <p>11 agreements or at least in the past. More recently there</p> <p>12 probably are.</p> <p>13 Q Ms. Paz, I just need to stop you and ask that</p> <p>14 you just answer my question?</p> <p>15 A I did answer your question.</p> <p>16 Q You haven't.</p> <p>17 The question was: Can you give me a single</p> <p>18 example, specific example of an unwritten agreement that</p> <p>19 Free Speech Systems has entered and been bound by?</p> <p>20 MR. CERAME: Objection.</p> <p>21 BY THE WITNESS:</p> <p>22 A An unwritten agreement that they have been</p> <p>23 bound by. I guess I don't know how -- I don't understand</p> <p>24 the question.</p> <p>25 Q Okay.</p>

June 27, 2022

<p style="text-align: right;">Page 745</p> <p>1 Well, you just testified that it is very common</p> <p>2 for Free Speech Systems to enter unwritten agreements,</p> <p>3 I'm asking you if you can give me a single specific</p> <p>4 example of such an unwritten agreement?</p> <p>5 MR. CERAME: Objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A Well, that's a different question. You asked</p> <p>8 me unwritten agreement that it has been bound by and then</p> <p>9 any unwritten agreement at all.</p> <p>10 Q Let's start with the first one. Can you give</p> <p>11 me a specific example of any unwritten agreement that</p> <p>12 Free Speech Systems has entered regardless of whether it</p> <p>13 was bound by it or not?</p> <p>14 MR. CERAME: Objection. I'm going to</p> <p>15 elaborate on the scope of my objection. It was</p> <p>16 asked and answered. She gave several examples.</p> <p>17 BY THE WITNESS:</p> <p>18 A I agree.</p> <p>19 Q Give me a specific example that Free Speech</p> <p>20 Systems is prepared to testified under oath to today of</p> <p>21 an unwritten agreement it has entered?</p> <p>22 MR. CERAME: Objection. Vagueness. Asked</p> <p>23 and answered.</p> <p>24 BY THE WITNESS:</p> <p>25 A As I said earlier, I think that none of the</p>	<p style="text-align: right;">Page 747</p> <p>1 response to Mr. Cerame's questions that it was very</p> <p>2 common for Free Speech Systems to enter unwritten</p> <p>3 agreements. You testified to that, yes or no?</p> <p>4 A My testimony was that it was common that</p> <p>5 agreements, in general, or anything regarding the</p> <p>6 structure or hierarchy or agreements between parties,</p> <p>7 there aren't any written agreements at all that I could</p> <p>8 find between anybody. So, regardless of whether it's</p> <p>9 agreements we're bound by or bound to us, I don't --</p> <p>10 there are no agreements. There's just nothing in</p> <p>11 writing. Those two notes are the only thing that I could</p> <p>12 find that were in writing.</p> <p>13 Q But, Ms. Paz, are you then intuiting from the</p> <p>14 fact that nobody showed you any written agreements that</p> <p>15 all agreements that Free Speech Systems enters must be</p> <p>16 unwritten?</p> <p>17 MR. CERAME: Objection.</p> <p>18 BY THE WITNESS:</p> <p>19 A No.</p> <p>20 Q Can you identify for me any unwritten</p> <p>21 agreement, any at all, to which Free Speech Systems is a</p> <p>22 party?</p> <p>23 MR. CERAME: Objection.</p> <p>24 BY THE WITNESS:</p> <p>25 A I can't --</p>
<p style="text-align: right;">Page 746</p> <p>1 agreements as far as the structure, who reports to who --</p> <p>2 THE WITNESS: Do you need to do something</p> <p>3 about that?</p> <p>4 BY THE WITNESS:</p> <p>5 A So, I don't know that any of the -- there are</p> <p>6 any written agreements regarding the marketing to third</p> <p>7 parties. We bill for those --</p> <p>8 Q You say you don't know. But I'm asking you</p> <p>9 what you do know. So, I understand that you're saying, I</p> <p>10 don't know whether among the unwritten agreements that</p> <p>11 I've referenced are agreements with third-party</p> <p>12 advertisers. Okay? I'm asking you what you do know.</p> <p>13 Okay?</p> <p>14 MR. CERAME: Objection.</p> <p>15 BY MR. MATTEI:</p> <p>16 Q I'm asking specifically about unwritten</p> <p>17 agreements to which Free Speech Systems is a party?</p> <p>18 MR. CERAME: You're asking about something</p> <p>19 that doesn't exist.</p> <p>20 MR. MATTEI: Mario. Mario. Can you just</p> <p>21 please can let me ask my question.</p> <p>22 MR. CERAME: Sure.</p> <p>23 MR. MATTEI: Thank you.</p> <p>24 BY MR. MATTEI:</p> <p>25 Q You agree with me that you testified in</p>	<p style="text-align: right;">Page 748</p> <p>1 MR. REILAND: Objection. Asked and</p> <p>2 Answered.</p> <p>3 BY THE WITNESS:</p> <p>4 A I can't testify to a negative; but I've given</p> <p>5 you --</p> <p>6 Q No, it isn't. It's not a negative.</p> <p>7 A It is a negative.</p> <p>8 Q Just because something is unwritten doesn't men</p> <p>9 mean it doesn't exist; right?</p> <p>10 MR. CERAME: Objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A I don't know how to answer that question.</p> <p>13 There are no written agreements that I could show you.</p> <p>14 I've asked for written agreements. They don't exist.</p> <p>15 Q I'm not asking about written agreements. I'm</p> <p>16 asking about unwritten agreements. That is an agreement</p> <p>17 that Free Speech Systems made but did not reduce to</p> <p>18 writing. And I'm --</p> <p>19 MR. CERAME: Objection.</p> <p>20 BY MR. MATTEI:</p> <p>21 Q -- asking whether you can give me a single</p> <p>22 example of such an agreement?</p> <p>23 A I've given a couple examples.</p> <p>24 Q I don't believe that you have. What you've</p> <p>25 said is I don't know. --</p>

June 27, 2022

<p style="text-align: right;">Page 749</p> <p>1 A That's --</p> <p>2 Q -- if certain agreements are written.</p> <p>3 A That's not what I said.</p> <p>4 Q Let's just make sure we get it out then.</p> <p>5 MR. CERAME: Objection. Move to strike</p> <p>6 the colloquy.</p> <p>7 BY MR. MATTEI:</p> <p>8 Q Can you give me one example that you can</p> <p>9 testify to under oath of an unwritten agreement that Free</p> <p>10 Speech Systems has entered?</p> <p>11 MR. CERAME: Objection.</p> <p>12 BY THE WITNESS:</p> <p>13 A I answered the question already.</p> <p>14 Q You're going to answer it again and you are</p> <p>15 going to give me an example. If you have one. If you</p> <p>16 don't have one, that's fine.</p> <p>17 A I've given an example.</p> <p>18 Q Tell me what it is?</p> <p>19 MR. CERAME: Objection.</p> <p>20 BY THE WITNESS:</p> <p>21 A I've given the example of employment agreements</p> <p>22 in the context of past practice. I've given examples in</p> <p>23 the sense of marketing agreements. For example, there</p> <p>24 are payments in the advertising ledger that I asked about</p> <p>25 from PQPR to Free Speech and it was just for the year</p>	<p style="text-align: right;">Page 751</p> <p>1 BY MR. MATTEI:</p> <p>2 Q In other words -- simply because there's not a</p> <p>3 written agreement doesn't therefore mean that there is an</p> <p>4 agreement. It's just unwritten. So, what I'm asking you</p> <p>5 is you've given me an example, you said in the past Free</p> <p>6 Speech Systems has unwritten agreements with employees.</p> <p>7 Give me one employee with whom it has entered and</p> <p>8 unwritten agreement?</p> <p>9 A I can't answer a question. I don't know the</p> <p>10 answer to that question.</p> <p>11 Q Fair enough. So, you can't identify --</p> <p>12 A Correct.</p> <p>13 Q -- specifically, any employment agreement that</p> <p>14 Free Speech Systems has entered that was unwritten;</p> <p>15 correct?</p> <p>16 A I can't identify a specific person, no.</p> <p>17 Q Okay.</p> <p>18 And then you talked about marketing agreements.</p> <p>19 A Mm-hm.</p> <p>20 Q Give me one example of a advertiser with whom</p> <p>21 Free Speech Systems has entered an unwritten agreement.</p> <p>22 A I just did.</p> <p>23 Q Who?</p> <p>24 A As I just testified there was a period of time</p> <p>25 in 2015 that I noticed in the advertising ledger that</p>
<p style="text-align: right;">Page 750</p> <p>1 2015 and I asked why these payments were being made.</p> <p>2 Nobody could answer me. I couldn't -- I don't have any</p> <p>3 agreement as to why it was that way and it was just for</p> <p>4 that one year. So, the agreement, obviously, was not</p> <p>5 reduced to writing. So, those are a couple of examples.</p> <p>6 Q Wait a minute.</p> <p>7 So, employees -- okay.</p> <p>8 With what employees does Free Speech Systems</p> <p>9 have an unwritten agreement?</p> <p>10 MR. CERAME: Objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A Do you want me to go through all of the</p> <p>13 employees.</p> <p>14 Q No, I just want you to give me one. With whom</p> <p>15 does Free Speech Systems have an unwritten agreement</p> <p>16 that -- among it's employees?</p> <p>17 A In past or now?</p> <p>18 Q At any time?</p> <p>19 A In the past, there were no employment</p> <p>20 agreements. People were just kind of hired, they filled</p> <p>21 out their forms and then that was it. There were no</p> <p>22 employment agreements. But --</p> <p>23 Q But with whom did they have an unwritten</p> <p>24 agreement?</p> <p>25 MR. CERAME: Objection.</p>	<p style="text-align: right;">Page 752</p> <p>1 PQPR was paying or Free Speech Systems was paying PQPR</p> <p>2 when -- it's usually vice versa. So, I asked why were we</p> <p>3 making these payments and it was only for this one</p> <p>4 particular period of time, and the answer was, I don't</p> <p>5 know, but this was the time period that we were making</p> <p>6 the payments. But it ended after 2015.</p> <p>7 Q Who did you ask that question?</p> <p>8 A I asked Blake.</p> <p>9 Q Okay.</p> <p>10 You asked Blake --</p> <p>11 A And I also asked Mark.</p> <p>12 Q Mark Schwartz?</p> <p>13 A Yes.</p> <p>14 Q Blake and Mark Schwartz.</p> <p>15 Why was Free Speech Systems making these</p> <p>16 payments to PQPR in 2015; correct?</p> <p>17 A Right.</p> <p>18 Q And the answer was, We don't know?</p> <p>19 A Right.</p> <p>20 Q The answer was not it was pursuant to an</p> <p>21 unwritten agreement; correct?</p> <p>22 A That doesn't make any sense. There would have</p> <p>23 had to be some kind of agreement why they were paying</p> <p>24 that money, so, it doesn't make sense.</p> <p>25 Q Nobody told you that there was an unwritten</p>

June 27, 2022

Page 753

1 agreement governing Free Speech Systems' payments to PQPR
 2 in 2015; correct?
 3 A I think that's common sense.
 4 Q Did anybody tell you that?
 5 A I don't think anybody could answer me why.
 6 Q Right.
 7 But if there was an unwritten agreement,
 8 wouldn't somebody have been able to tell you that the
 9 reason these payments were being made is because it was
 10 pursuant to an unwritten agreement?
 11 MR. CERAME: Objection.
 12 BY THE WITNESS:
 13 A Not necessarily.
 14 Q You don't know whether there was an unwritten
 15 agreement governing --
 16 A I don't know why those payments were made.
 17 MR. CERAME: Objection.
 18 BY MR. MATTEI:
 19 Q Would you care to try to give me another
 20 specific example of an unwritten agreement that Free
 21 Speech Systems entered?
 22 A No, I will rely on my testimony.
 23 Q So, there are no others that you're aware of
 24 correct?
 25 A That's not what I said. I just said I don't

Page 754

1 care to do any more.
 2 Q Then I will ask you. Are there any others that
 3 you're aware of?
 4 MR. CERAME: Objection.
 5 BY THE WITNESS:
 6 A I don't know.
 7 Q You don't know whether you're aware of any
 8 others?
 9 A All I'm --
 10 MR. REILAND: Objection.
 11 BY THE WITNESS:
 12 A At this point, my testimony is that this is not
 13 a company that reduces --
 14 Q Ma'am, you don't get to testify without any
 15 questions.
 16 A You asked me a question and I'm --
 17 MR. REILAND: She's answering your
 18 question. You made your point.
 19 BY THE WITNESS:
 20 A I've answered the question.
 21 Q The question I'm asking, Ms. Paz, is do you
 22 know whether there were any other unwritten agreements?
 23 A And I answered it.
 24 Q No. What you said is I don't know.
 25 A And that was my answer.

Page 755

1 MR. REILAND: That's an answer.
 2 BY MR. MATTEI:
 3 Q So, you don't know whether there are any
 4 others?
 5 A How many times do you want me to testify to
 6 that?
 7 MR. CERAME: Objection.
 8 BY MR. MATTEI:
 9 Q What were the 2015 payments for that you asked
 10 Mr. Roddy and Mr. Schwartz about?
 11 A I don't know. They weren't able to tell me.
 12 They were in the advertising income documents.
 13 Q They were payments to PQPR or to Free Speech
 14 Systems?
 15 A To PQPR.
 16 Q And they were identified as advertising-related
 17 payments?
 18 A They were in the advertising section of the
 19 account. So, it's broken down by account and so all of
 20 our payments for advertising are in a specific account
 21 and that was in that account. So I asked about those.
 22 Q Prior to your involvement in this case, you had
 23 no prior experience concerning estimates of radio
 24 audience; correct?
 25 A No.

Page 756

1 MR. CERAME: Objection. And I -- this is
 2 not within the scope of my redirect I would
 3 note.
 4 BY MR. MATTEI:
 5 Q The only information you have concerning radio
 6 audience size comes from your conversation with
 7 Mr. Jones; correct?
 8 MR. CERAME: Objection.
 9 BY THE WITNESS:
 10 A And whatever information we've discussed and
 11 read.
 12 Q You mean, during our deposition today?
 13 MR. CERAME: Objection.
 14 BY THE WITNESS:
 15 A Not just during our deposition. I mean, I did
 16 read the transcripts of all of the videos. So, I did
 17 read all of those transcripts. So --
 18 Q I guess it's fair to say you don't consider
 19 yourself qualified to discuss --
 20 A Of course not.
 21 Q -- what the industry standards are in
 22 measuring --
 23 A Right.
 24 Q -- audience size?
 25 A Right. Of course not. No.

June 27, 2022


<p style="text-align: right;">Page 757</p> <p>1 MR. CERAME: Objection.</p> <p>2 MR. MATTEI: That's all I have.</p> <p>3 MR. CERAME: I do have some redirect based</p> <p>4 on some of the questions that were asked.</p> <p>5 EXAMINATION BY MR. CERAME:</p> <p>6 Q Can you identify any employee with a written</p> <p>7 agreement between Free Speech Systems and the employee?</p> <p>8 A Currently?</p> <p>9 Q Let's say before 2016.</p> <p>10 A Before 2016, no.</p> <p>11 Q So, do you know -- Same thing. Before 2016,</p> <p>12 can you identify an advertiser with whom Free Speech</p> <p>13 Systems had a written agreement?</p> <p>14 A No, because I don't believe that they were</p> <p>15 reduced to writing.</p> <p>16 Q Okay.</p> <p>17 Aside from -- Do you know about that 2016, 2017</p> <p>18 memo between Free Speech Systems and Alex Jones and</p> <p>19 Genesis Communication Network?</p> <p>20 MR. MATTEI: Objection.</p> <p>21 BY THE WITNESS:</p> <p>22 A No. I don't think I've seen such a memo.</p> <p>23 Q So, aside from the possibility of such a memo</p> <p>24 that may or may not exist, you don't know of any written</p> <p>25 documents detailing a written agreement between Genesis</p>	<p style="text-align: right;">Page 759</p> <p>1 decades.</p> <p>2 A Mm-hm.</p> <p>3 Q That's a yes?</p> <p>4 A Yes.</p> <p>5 Q And you're not aware of any written agreements</p> <p>6 between them prior to 2015?</p> <p>7 A No.</p> <p>8 Q But you, as corporate representative, believe</p> <p>9 there is an agreement or have been business agreements</p> <p>10 between Genesis Communication Network and Free Speech</p> <p>11 Systems?</p> <p>12 MR. MATTEI: Objection.</p> <p>13 BY THE WITNESS:</p> <p>14 A Well, I know they've been in business with each</p> <p>15 other for a great number of years. So, you would have to</p> <p>16 have some form of an agreement. But as I said, it's just</p> <p>17 not in writing.</p> <p>18 Q So, the exchange of services and monies doesn't</p> <p>19 happen without an agreement as a matter of common sense;</p> <p>20 right?</p> <p>21 MR. MATTEI: Objection.</p> <p>22 BY THE WITNESS:</p> <p>23 A Exactly.</p> <p>24 Q Okay.</p> <p>25 MR. CERAME: I have no further question.</p>
<p style="text-align: right;">Page 758</p> <p>1 Communication Network and Free Speech Systems prior to</p> <p>2 2016?</p> <p>3 A Correct.</p> <p>4 Q And you would agree that Free Speech Systems</p> <p>5 has been in business with advertisers?</p> <p>6 A Oh, yes.</p> <p>7 Q Okay.</p> <p>8 And you would agree that there is an agreement</p> <p>9 between Free Speech Systems and the advertisers?</p> <p>10 MR. MATTEI: Objection.</p> <p>11 BY THE WITNESS:</p> <p>12 A There would have to be some agreement.</p> <p>13 Q So, let me make sure I understand this: You</p> <p>14 don't know the -- you don't know the details of the</p> <p>15 agreement, but as you sit here as the representative for</p> <p>16 Free Speech Systems, there is such an agreement you</p> <p>17 believe?</p> <p>18 MR. MATTEI: Objection.</p> <p>19 BY THE WITNESS:</p> <p>20 A I would think there would have to be an</p> <p>21 agreement. It's not in writing.</p> <p>22 Q Okay.</p> <p>23 And similarly, between Free Speech Systems and</p> <p>24 Genesis Communication Network. Previously, we discussed</p> <p>25 how they had been working together for at least two</p>	<p style="text-align: right;">Page 760</p> <p>1 EXAMINATION BY MR. MATTEI:</p> <p>2 Q You testified in response to Attorney Cerame's</p> <p>3 questions that you're not aware of any agreements with</p> <p>4 Free Speech Systems' employees prior to 2016?</p> <p>5 MR. CERAME: Objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A Am I aware of any agreements? Of whether</p> <p>8 written agreements existed?</p> <p>9 Q Between Free Speech Systems and its employees.</p> <p>10 A I don't think there were any written agreements</p> <p>11 between their employees prior to 2016.</p> <p>12 Q Ms. Paz, weren't there non-disclosure</p> <p>13 agreements entered as a regular course of hiring</p> <p>14 employees at Free Speech Systems?</p> <p>15 MR. CERAME: Objection.</p> <p>16 BY THE WITNESS:</p> <p>17 A Prior to 2016?</p> <p>18 Q Yeah.</p> <p>19 A I don't know if it was prior to 2016. I know</p> <p>20 now it is.</p> <p>21 Q Okay, so Free Speech Systems is unaware whether</p> <p>22 it required non-disclosure agreements to be entered by</p> <p>23 new hires prior to 2016?</p> <p>24 A Prior to 2016, no, I don't know.</p> <p>25 MR. CERAME: Objection.</p>

June 27, 2022

<div>Page 761</div> <div><div>1</div><div>BY THE WITNESS:</div><div>2</div><div>A But now I know it is.</div><div>3</div><div>Q Okay.</div><div>4</div><div>MR. MATTEI: That's all I got.</div><div>5</div><div>MR. CERAME: I have no questions in</div><div>6</div><div>response. I suppose I should ask whether</div><div>7</div><div>counsel does have any.</div><div>8</div><div>MR. REILAND: I have no questions.</div><div>9</div><div>MR. MATTEI: All right. So, the</div><div>10</div><div>deposition is being kept open pending</div><div>11</div><div>production of documents that were described</div><div>12</div><div>here today. And we'll see if we have to come</div><div>13</div><div>back.</div><div>14</div><div>MR. CERAME: I would just ask that any --</div><div>15</div><div>because those documents have nothing to do with</div><div>16</div><div>the subject matter of my cross, I would ask</div><div>17</div><div>that that be not be the subject -- that it's</div><div>18</div><div>closed as to that subject of the issues that we</div><div>19</div><div>raised during my cross. Except being inasmuch</div><div>20</div><div>as I suppose the documents might reveal</div><div>21</div><div>something relevant.</div><div>22</div><div>MR. MATTEI: I'm not going to --</div><div>23</div><div>MR. CERAME: I'm not going to enter into</div><div>24</div><div>an agreement as to that. I'm going to note</div><div>25</div><div>that then for the record.</div></div>	<div>Page 763</div> <div><div>1</div><div>I, BRITTANY PAZ, have read the foregoing</div><div>2</div><div>transcript of the testimony given at my deposition on</div><div>3</div><div>June 27, 2022, and it is true and accurate to the best of</div><div>4</div><div>my knowledge and belief as originally transcribed and/or</div><div>5</div><div>with the changes as noted on the attached Correction</div><div>6</div><div>Sheet.</div><div>7</div><div></div><div>8</div><div></div><div>9</div><div></div><div>10</div><div>BRITTANY PAZ</div><div>11</div><div></div><div>12</div><div>Subscribed and sworn to before me this</div><div>13</div><div>this _____ day of _____, 2022.</div><div>14</div><div></div><div>15</div><div></div><div>16</div><div>Notary Public</div><div>17</div><div>My Commission Expires October 31, 2025.</div><div>18</div><div></div><div>19</div><div></div><div>20</div><div></div><div>21</div><div></div><div>22</div><div></div><div>23</div><div></div><div>24</div><div></div><div>25</div><div></div></div>
<div>Page 762</div> <div><div>1</div><div>MR. MATTEI: Thank you. Thank you</div><div>2</div><div>everybody.</div><div>3</div><div>THE VIDEOGRAPHER: We are off the record</div><div>4</div><div>at 4:19 and this concludes today's deposition</div><div>5</div><div>given by Brittany Paz.</div><div>6</div><div>(Whereby, the deposition concluded</div><div>7</div><div>at 4:19 p.m.)</div><div>8</div><div></div><div>9</div><div>* * * * *</div><div>10</div><div></div><div>11</div><div></div><div>12</div><div></div><div>13</div><div></div><div>14</div><div></div><div>15</div><div></div><div>16</div><div></div><div>17</div><div></div><div>18</div><div></div><div>19</div><div></div><div>20</div><div></div><div>21</div><div></div><div>22</div><div></div><div>23</div><div></div><div>24</div><div></div><div>25</div><div></div></div>	<div>Page 764</div> <div><div>1</div><div>INDEX</div><div>2</div><div></div><div>3</div><div>EXAMINATION</div><div>4</div><div>Witness Name</div><div>Page</div><div>Line</div><div>5</div><div>BRITTANY PAZ</div><div>6</div><div>Examination By Mr. Mattei</div><div>554</div><div>6</div><div>7</div><div>Examination By Mr. Cerame</div><div>714</div><div>6</div><div>8</div><div>Examination By Mr. Mattei</div><div>731</div><div>7</div><div>9</div><div>Examination By Mr. Cerame</div><div>739</div><div>10</div><div>10</div><div>Examination By Mr. Mattei</div><div>743</div><div>21</div><div>11</div><div>Examination By Mr. Cerame</div><div>757</div><div>5</div><div>12</div><div>Examination By Mr. Mattei</div><div>760</div><div>1</div><div>13</div><div></div><div>14</div><div>PLAINTIFF'S EXHIBITS</div><div>(Exhibits 118-125 were pre-marked for this deposition)</div><div>15</div><div>Exhibit</div><div>Description</div><div>Page</div><div>Line</div><div>16</div><div>126</div><div>Typewritten notes</div><div>554</div><div>19</div><div>17</div><div>127</div><div>Chart</div><div>617</div><div>10</div><div>18</div><div>128</div><div>Chart</div><div>617</div><div>12</div><div>19</div><div>129*</div><div>Audio file</div><div>738</div><div>1</div><div>20</div><div>130*</div><div>Audio file</div><div>739</div><div>4</div><div>21</div><div></div><div>22</div><div></div><div>23</div><div>(*Exhibits 129-130 were retained by Counsel)</div><div>24</div><div></div><div>25</div><div></div></div>

June 27, 2022

Page 765		Page 767	
1	EXHIBITS REFERRED TO	1	CORRECTION TO DEPOSITION
2	Exhibit	2	ERICA LAFFERTY, et al. v. ALEX EMRIC JONES, et al.
3	117, 118 566	3	WILLIAM SHERLACH v. ALEX EMRIC JONES, et al.
4	106 580	4	WILLIAM SHERLACH, et al. v. ALEX EMRIC JONES, et al.
5	117 608	5	BRITTANY PAZ
6	106 623	6	In order to make this deposition more nearly conform to
7	117 640	7	the testimony given, the witness wishes to make the
8	118 644	8	following changes:
9	108 660	9	PAGE LINE NOW READS SHOULD READ
10	121 677	10	_____
11	122 679	11	_____
12	123 684	12	_____
13	124 687	13	_____
14	125 688	14	_____
15	2 691	15	_____
16		16	_____
17	REQUESTS FOR PRODUCTION	17	_____
18	Request	18	_____
19	# 1 567	19	_____
20	# 2 712	20	_____
21	# 3 734	21	_____
22	# 4 735	22	_____
23		23	Subscribed and sworn to before me:
24		24	Dated this _____ day of _____, 20____.
25		25	(Notary Public) Deponent (signature)
		26	My Commission Expires:
		27	

Page 766	
1	CERTIFICATE
2	
3	STATE OF CONNECTICUT)
4) SS SOUTHBURY
5	COUNTY OF NEW HAVEN)
6	
7	I, VIKTORIA V. STOCKMAL, a Notary Public duly
8	commissioned and qualified in and for the county of
9	Fairfield, State of Connecticut, do hereby certify that
10	pursuant to the notice of deposition, the said witness
11	came before me at the aforementioned time and place and
12	was duly sworn by me to testify to the truth and nothing
13	but the truth of his/her knowledge touching and
14	concerning the matters in controversy in this cause; and
15	his/her testimony reduced to writing under my
16	supervision; and that the deposition is a true record of
17	the testimony given by the witness.
18	
19	I further certify that I am neither attorney of
20	nor counsel for, nor related to or employed by any of the
21	parties to the action in which this deposition is taken,
22	and further that I am not a relative or employee of any
23	attorney or counsel employed by the parties thereto, or
24	financially interested in the action.
25	IN WITNESS WHEREOF, I have hereunto set my hand
	and affixed my notarial seal this 18th day of July, 2022.
	
	VIKTORIA V. STOCKMAL, RMR, CRR
	Notary Public
	CSR License #00251
	My commission expires October 31, 2025

June 27, 2022

Exhibits	\$	\$70	704:20 742:5
EX 0118 Britt any Paz Vol. III 062722	\$11,000 606:13,15 607:9,20 609:20,21,25	692:25 693:8 \$8 653:24 654:19	106 580:18 623:15
EX 0119 Britt any Paz Vol. III 062722	610:2,4,6, 16,20 611:2, 9,22,25	-	108 660:23
EX 0120 Britt any Paz Vol. III 062722	613:4 614:1 615:4 616:12 618:6 619:5,	-X 548:3,8,13, 18	10:11 548:25 552:10
EX 0121 Britt any Paz Vol. III 062722	14,25 620:5, 15,19	0	117 566:1 599:19 608:2
677:8	\$181,925	06106 549:19	118 566:1 599:19
EX 0122 Britt any Paz Vol. III 062722	662:7 \$2,500 693:7	06484 553:14	11:35 616:1,2
679:20	\$25 642:8	06511 549:13	11:50 616:3,5
EX 0123 Britt any Paz Vol. III 062722	\$25.3 645:20	06604 549:4	121 677:8
EX 0124 Britt any Paz Vol. III 062722	\$29.5 608:14 609:5 610:13	1	122 679:20
EX 0125 Britt any Paz Vol. III 062722	622:12 634:13 638:21 639:12	1 618:3	123 684:3
688:19	\$29.588 644:8	1.5 611:1	124 687:11,13, 16,17
EX 0126 Britt any Paz Vol. III 062722	\$30,000 572:4,12	1.75 609:9,10 610:13	125 688:19
554:19,23	\$50.5 666:11,17	1.8 646:11	126 554:18,19,23
EX 0127 Britt any Paz Vol. III 062722	\$54 636:16 676:24	10 564:15 566:15 603:19 604:3,20 620:17 644:23 646:15	127 617:8,10,15 618:3
617:10	\$566,000 704:17	100 633:11 641:5 642:5 665:1 682:10 685:2	128 617:8,12,15
EX 0128 Britt any Paz Vol. III 062722	\$6.79 664:12		129 737:25 738:1
617:12	\$7,500 572:16 573:17		12:08 736:13
#			12:42 652:15,16
#00251 548:24			12th 558:18
			13 566:4 640:22 702:15,24

June 27, 2022

130 739:3,4	740:17	2017 556:4	23 640:17,22
13th 608:9 609:4	2002 580:9 581:14	664:10,20	643:25
733:12	2012 577:16	680:1,15	644:17
735:15	578:9,22	683:25	645:2,12,17,
736:12	579:8 580:9	757:17	24 647:4
140 678:2,13	581:13	2018 597:23	655:14,16,17
679:13	582:1,14	598:1,3,8,9	660:1 663:6
15 681:9,15	583:2,10,14	599:6,12,21	665:23 666:5
735:21	593:3 622:8,	600:2,6,8,20	669:2
738:13	20 659:23	601:6,22	674:23,25
15-year 646:16	663:6 665:23	602:19 604:4	675:1 704:24
16th 554:12	666:5 669:2	605:4,8,10	706:21
17th 559:1 560:25	704:24	611:22	709:20
568:14	705:20,24	615:14 616:9	731:11
18 566:13	706:20	618:5 621:25	2021 566:15
18:57 680:20	709:2,4,20	622:12	599:22
18th 641:6	714:16	632:16	606:11
19th 680:1,14	2013 596:24	634:13	607:14
1:38 652:17,19	677:21 678:5	636:20,21	611:12,15,23
	679:4,12	637:10,14,	612:18 614:1
	707:1,2	16,17,21	615:5 616:13
	708:1,7	638:17,23,25	644:23,25
	2014 596:16,23	639:12,16	645:6,9,11,
	622:8 623:23	640:7,10,12	22 646:10
	624:20,21	644:1,13	655:15,16,
	625:1,15,18	645:1,17	19,23,24
	629:8	688:6,12	656:5,23
	630:10,21	705:20,25	657:1,6,16,
	632:24	2019 583:2 645:2,	19,23
	634:13	5,12,17,24	658:23,24,25
	635:14 637:3	646:3 689:1	659:9,17
	644:13	690:6	660:1
2 652:13 681:7	2015 750:1 751:25	2020 566:4 577:17	674:10,24,25
682:12,16	752:6,16	578:9,22	675:2,4
683:4 691:2	753:2 755:9	579:8 582:1,	676:20
2,500 693:5,7,8	759:6	14 583:10,14	731:12
2.06 663:1,6	2016 662:5 757:9,	599:22 608:9	2021's 645:10
2.064 663:3	10,11,17	609:4 610:3	2022 548:25 552:9
20 604:19	758:2 760:4,	611:5 635:5,	555:14 654:6
620:16	11,17,19,23,	15,24 636:21	656:17,20
	24	637:3,9,17,	659:16
		20 638:2,8,	715:6,13
		14,19,20	203-336-4421 549:4
		639:6,7,14,	

June 27, 2022

203-393-3017	3:10	589:3	
549:14	710:18,19	686:12,14,25	9
2036	3:19	688:12 690:3	
646:15	710:19,21	6.6	9
2050		664:16,20,23	563:19
610:10	4	6.9	90
21		664:19,23	552:14
736:11	4	7	597:7,18
22	553:13		604:2,11
681:24	555:14		619:2
22-plus	562:19 563:6	7	
681:20	589:3 683:7,13	680:18 733:4	A
25.3	4.5	70	a.m.
636:23	681:6	691:14	548:25
645:25	402	692:23	552:10
260	553:13	70s	616:2,3
691:16	45	604:18	ability
692:23,25	652:10	614:17	742:17
693:9	683:19,20,25	72	able
27	4:19	604:18,22	560:1,2,6
548:25	762:4,7	605:9 619:17	561:10
27th	4th	644:1	562:3,22
552:9 558:17	688:6	72-some	563:1,5,21,25 564:8
28th	5	633:15	637:22 660:2
679:12	5	8	672:16
29.5	563:10	8	692:2,17
600:6 608:22	5.98	563:15	693:23 694:1
636:20	662:8	680:17,18	695:1,7,9
3	50.5	80	698:11,17
	663:5	595:20	700:17
3	50.515	597:2,17	702:8,11
678:3,17	663:4	603:19,21	753:8 755:11
679:14	53-plus-million	604:9,12,13,20 613:8	above
30	668:25	614:16,17	641:2
610:8,14	54	616:18,19	accept
611:1	636:19	618:25	710:7,10
30-year	566,000	620:23	acceptable
607:23	703:10	860-527-9973	582:7
646:13	6	549:19	access
3005	6	8th	621:23
641:3		677:20 679:4	699:15
350			accesses
548:22			701:11
383			accessing
549:13			700:3

June 27, 2022

accordance 619:17	accrued 636:21 645:24	701:25 707:22 710:4 711:25 712:1 742:11	advance 562:14 570:6 596:21
account 564:11 580:4 581:15 645:22 672:8,11,18, 20 676:2,11 690:23 706:3 707:8 755:19,20,21	accruing 623:22 624:1 625:18 638:8 674:17	Adan 698:5	advertise 686:5 689:22 704:17 711:2
accountant 559:11 564:20 565:1,8,9 660:14,20 670:13 693:19 708:1,4	accurate 613:7 622:7 638:3 669:10,11 687:7 688:16 690:6 724:9 735:3,7 742:5	Adan's 695:3 699:10 701:24	advertisement s 575:20,24
accountants 555:9 645:13 657:18	acknowledge 686:24	add 669:1	advertiser 690:9 710:8 751:20 757:12
accounted 607:1 706:15	acknowledges 654:9 690:5	added 667:4	advertisers 686:4,6 711:2,5,12 712:23 746:12 758:5,9
accounting 584:23 585:5 670:15 673:1 706:20 707:13	across 685:21	addition 568:4 572:12 618:5 619:14 662:9,15 665:12 666:23	advertises 560:4
accounting- wise 593:18	act 643:12	additional 572:9,15 573:14 615:5 618:19	advertising 555:7,13 560:4,5 561:6,12 562:5 563:6, 11 579:2 580:22 625:23,24 627:14,18 651:9,15,17, 22 689:13,19 690:12 694:20 705:9,10 706:1,9 707:4,15,19 708:8 709:8 710:9,11 711:11,22,24 712:16 713:2 720:6,23 721:8 749:24 751:25 755:12,18,20
accounts 580:7 581:16 582:15 621:23 690:20 703:22,25 708:12 742:9	action 552:16 714:9	address 553:13	advertising- related 755:16
accrual 600:15 638:13 671:24 675:9	actively 650:16	adds 660:16	
accrue 622:5 630:21 631:13 634:8 635:15	activities 583:11,15 587:9,14 588:5 591:16 593:11 594:5	adjusted 706:17	
	activity 556:17 561:7 647:17	administratio n 552:25 580:22	
	actual 566:25 568:22,24 599:23 687:14 705:13 714:15	administrativ e 587:14 591:15	
	ad 648:4,9 682:11 695:2,5 697:8 699:11	ads 575:8,10,12, 14,15,16 584:7 627:7 647:21 695:4 697:15,21 700:5,6 703:8,9 704:7 721:11,12	

June 27, 2022

advice	740:10	15,16 749:2,	654:14,24
715:14,22	745:18	21,23	659:22
AEJ	746:25	750:20,22	661:12,14
595:21,24	758:4,8	751:6,18	662:22,23
598:8,9	agreed	754:22	663:5 673:16
599:6,12,13	550:3,9,14,	759:5,9	677:17 678:7
601:22 602:3	19 609:8,13	760:3,7,8,	679:7,12,17,
605:6,10,23	agreeing	10,13,22	19 680:2,14,
611:21	610:13	agrees	21 685:25
612:10	agreement	552:25 553:6	686:5 687:1
613:8,18,19	552:6 572:14	680:13	690:2 698:12
615:14,18,21	573:24 574:2	ahead	716:11,12
616:9 618:5	608:6	596:21	717:1
619:18	727:16,17,20	598:22,24	719:14,15
620:20,25	728:10,11	618:12,19	726:10,12,
621:25 644:1	729:4,20	682:10	13,14
affected	732:6 742:17	705:23	727:10,18,23
603:1	743:25	713:13	728:9,18,20,
affects	744:7,18,22	736:19	22 730:17
683:20	745:4,8,9,	air	731:1 733:4
affiliate	11,21 747:21	587:24,25	739:19
650:23	748:16,22	678:8,9,13	740:12 741:9
651:3,8,16,	749:9 750:3,	685:25	742:8,24
18,25 652:4	4,9,15,24	698:13 699:8	757:18
684:14,19	751:3,4,8,	717:8	Alex's
685:17,18,	13,21	aired	702:2
19,24 687:24	752:21,23	708:8	Alinor
724:14,18,19	753:1,7,10,	airing	549:7 551:9
affiliates	15,20 757:7,	679:13	alphabet
682:10	13,25 758:8,	Alex	594:24
684:19	12,15,16,21	548:7,12,17	595:20
685:20,25	759:9,16,19	549:10	altered
686:1	761:24	551:15	709:21,23
affirm	agreements	552:12	Amazon
718:21 719:6	727:22	570:25	651:24
affirmed	729:21	597:8,16,17	amendment
553:16	731:13,14,	599:5 606:20	715:14,18
afternoon	15,16,17,19	607:4,11	amount
716:13	732:11	620:16,21,24	635:8 644:10
agencies	739:12,14,15	621:10,19,22	662:7,16,25
682:11	740:22	632:9,13,16,	691:25 699:2
ago	743:24	19,24,25	700:18,21
571:12 575:4	744:2,3,11	633:9,20	711:1
593:3 651:2	745:2 746:1,	641:9,17	amounts
agree	6,10,11,17	642:2	661:12,13,14
601:5 679:3	747:3,5,6,7,	643:24,25	662:21
685:9 687:17	9,10,14,15	646:18 647:6	673:21
	748:13,14,	651:1 653:11	

June 27, 2022

analysis	751:9,10	646:14	arrived
645:11	752:4,18,20	680:16	610:4,24,25
668:10	753:5 754:25	692:22	672:6
analytics	755:1	705:16	arrow
681:4 695:1,	answered	719:22	702:25
7,9,22 696:2	716:7 718:16	735:20	article
697:12	745:16,23	appellate	627:9 696:20
703:20 704:8	748:2 749:13	715:4	698:5
analyzes	754:20,23	applied	699:14,15
622:10	answering	580:20	701:11,24
and/or	580:10	apply	702:14
553:16	754:17	553:23	articles
622:25	anticipate	730:20	627:10 695:3
Anderson	572:9,12,20	applying	697:1,19,22
723:13	573:4	646:11	699:6,10,11
727:9,22	anticipated	appreciate	asked
728:1,2,18,	711:9	597:15	561:20
20 730:10,18	anticipating	617:20 737:5	563:24
731:2	573:18	approach	564:3,4
annual	anybody	721:17	567:5,17,18
609:9	559:7 571:6,	approximate	579:5,7
answer	15 574:23	678:15	602:10
561:8,23,25	590:13	approximately	605:16 622:1
574:20	592:20 607:8	595:4 606:13	624:2 631:12
580:16	638:6,24	608:14	647:19
582:3,7,8	671:12	611:15 644:1	658:4,9,14,
583:17	721:25 747:8	653:24	23 659:13,15
593:25	753:4,5	654:19	667:19
594:10	anyone	668:25	669:20
614:11	656:15	684:23	672:15
618:14	717:8,21	686:25 690:6	692:4,6
622:2,7	726:15	704:16	694:22,23
628:20 633:4	730:14	April	705:16 710:1
634:10,19	anyone's	688:6,11	718:15,23
639:19	624:17 632:1	715:13	720:5,13
640:11 642:4	apparently	argument's	721:9 728:25
643:21	662:6	697:5	729:10
644:19	appeared	around	745:7,16,22
658:20	571:12	588:25	748:1,14
666:2,3,7	677:17	589:7,14	749:24 750:1
673:3	696:19	638:7 642:2,	752:2,8,10,
690:13,14	appearing	17,22 647:10	11 754:16
692:3 693:23	549:7,21	arrangement	755:9,21
694:2 698:19	697:21	610:17	757:4
721:16 732:4	appears	arrive	asking
744:14,15	637:19	607:19 610:2	561:17,19
748:12	641:24	716:17,20	562:24
749:14 750:2			581:11,13

June 27, 2022

592:9,10	715:17	657:18	657:11,14,25
600:23,25	assume	742:22,23	658:1,5,8,
601:2 610:1,	584:20	audience	15,22 659:1,
25 618:16,17	586:20	677:7 678:22	2,5,10,17
621:7,15	591:25 592:3	679:18 681:3	660:5,8,19
627:19 630:7	606:20 607:4	682:8 683:24	684:22
637:23	659:15	701:11	720:9,10
638:4,5	662:14 669:9	716:7,12,13,	Avenue
651:4 653:20	726:20	25 717:13,	548:22 549:3
654:3 657:9	assuming	16,21 718:3,	641:6
663:13	557:8	13,24 719:2	average
664:3,4	asterisk	723:14,17,	604:21
671:20	686:15,19	19,24 755:24	682:13,17
693:21	asterisks	756:6,24	683:5 703:9
698:18 703:4	661:11	audio	aware
706:11 707:1	asterling@	713:22	552:3 565:17
709:3 721:17	koskoff.com	737:17 738:2	568:13 574:8
733:13 745:3	549:5	739:5	575:1 576:21
746:8,12,16,	attempt	August	577:13
18 748:15,	719:22	566:4 599:22	594:20
16,21 751:4	attempted	608:9 609:4	607:7,8
754:21	634:21 638:7	610:3 611:5	614:8 616:11
aspect	700:8	635:5 637:3,	620:16
591:18	attention	9,10 638:8,	621:18 631:6
651:23	632:10	14,19 639:23	634:20
668:22 742:7	680:17	640:17,22	635:6,9
743:2	743:11,12	643:25	637:4 638:4
aspects	attorney	644:17 647:4	639:22
555:10	551:17	731:11	640:3,4,14
asset	553:4,8	Austin	642:13,16,
601:10,19	554:5 559:4,	586:5 588:8,	21,24 644:16
603:8	5,15 565:10	9 641:4,6	646:7 647:5,
assets	573:1,24	authority	9,12 653:4,
601:15	586:4 588:16	550:6 643:11	10,24 654:5,
602:17,21	598:18 602:8	647:13	13,14,18
603:6,7,9	616:15 617:4	authorize	655:18
assist	618:8 665:2	579:25	670:11
652:23	671:13	607:8,11	673:10
654:11	695:16	authorized	676:19
assistant	696:13	606:18 607:5	694:19 700:7
551:12	713:10 714:7	624:9,11,18	723:15
associated	717:10	631:12,24	731:8,12
564:11	724:19,21	653:8	753:23
625:20,22	732:16	automatically	754:3,7
631:4 638:6	733:6,20	737:12	759:5 760:3,
744:9	734:8 760:2	available	7
association	attorneys	573:4 655:25	
663:24	549:2,9	656:1,10,15	

June 27, 2022

	690:17,21,23	643:11,16	567:10,19
B	banking	646:2 647:12	569:8,17,25
	690:16,17	668:7 675:22	570:4 575:7,
B-2	bankruptcy	704:4 716:1	21 595:20
668:15	565:14	730:25	596:6,16
back	banner	Bates	597:23
554:9,11	648:6,9	680:9 685:13	598:10
575:8,10,16,	707:22	bathroom	599:13 600:8
25 584:6	711:25	702:18	604:17 606:8
593:8,23	banners	710:15	611:10
594:19 602:2	627:10 648:7	Baum	615:13
609:9 610:13	base	677:14 679:4	616:15 617:5
623:10 627:7	678:3,15	began	626:17 628:5
631:11,14	679:14	596:24	644:14
639:14,16	based	begin	650:15,19
644:5	557:15	578:5 606:18	651:14
647:21,22,24	565:10	624:9 634:8	652:24
650:6,17,20	587:16	713:13,21	655:14 657:3
688:2 690:11	607:21 610:3	beginning	661:3
699:15,25	611:10	558:17	670:19,21
700:16	639:10,12	601:13	671:8 672:1
713:16	664:7 668:2,	607:14 614:1	675:16
761:13	4 673:14	615:4 616:13	676:18
backup	675:8 678:16	625:15	677:15,19
654:4 661:17	694:13	628:23	690:22
bad	703:8,9	630:10,21	695:11
604:24	704:19	632:23	696:10,12
balance	717:1,14,18	644:17 675:4	704:9 707:17
580:25	719:13,16,	691:7	709:22
608:15,20,22	17,18 723:25	behalf	710:3,10,13
609:23	730:13,16,	551:7,9	714:19
612:24 613:1	23,25 740:2	552:19	717:23 723:8
636:21	741:16 757:3	560:19	725:8,10,11
645:2,14,18	basically	565:15	730:13 733:4
706:17	557:18	583:11,16	748:24
balances	570:14	641:9,13	757:14
645:14	574:13	643:6,12,16,	758:17 759:8
660:16	585:22 706:1	17 646:17,18	bell
balloon	707:18,21	647:1,13	653:3
607:24	720:8 721:10	661:12,13	Bellis
ballpark	basing	708:9	582:6
588:23	616:21	believe	below
Balm	641:23	554:10	703:15
678:1	basis	556:25	beneficiaries
bank	571:19	557:17,19	599:10
620:22	587:19 606:5	558:17	615:12
621:23	618:17,20	559:11,25	beneficiary
	629:5	565:3,9	615:10,18,20

June 27, 2022

616:8 619:21	15,22 625:2,	708:12	broad
620:21	4 629:4	bottom	552:14 686:1
benefit	674:20	557:7,14	broadcast
598:15	675:13	568:20	680:1 682:9,
599:10	Bing	569:16 680:9	14,24,25
605:19,23	721:12	685:12	683:4,7
615:16	bit	bought	684:20,22
beside	562:17	626:14	685:21
732:8	568:18	697:25 710:8	702:2,3
besides	593:17	Boulevard	717:3,9
718:4	603:25	641:3	724:20,25
best	628:10 682:5	bound	725:19 727:3
558:3,10	736:25	744:1,19,23	729:22
559:15	Blake	745:8,13	broadcasting
560:19 595:1	555:6,14	747:9	678:17
740:13,14,21	556:20,21	break	broadcasts
better	590:1,2	554:17 584:2	650:25
692:3	692:3 694:9,	596:8 602:9	725:21
Bidondi's	18,19 703:17	613:22	726:12
649:13,19	704:10,15	614:10,24,25	broken
Bieder	720:5 752:8,	615:24 616:7	755:19
548:22 549:3	10,14	617:4 649:4	Bronson
big	Blott	652:8 684:24	684:6 685:16
666:1 682:12	586:4 588:16	702:18	Bronson's
731:21 743:5	671:13	710:15,23	684:12 686:9
bigger	696:13	713:16	broth
741:21,22	732:20,21	719:22	648:10,17
biggest	Bob	Bridgeport	brought
636:14	555:8 557:18	548:22 549:4	702:10
bill	691:5 692:2,	brief	business
632:2,5	4 709:11	685:19	553:13
711:23 744:5	710:2	briefly	556:17 585:2
746:7	body	617:17 716:5	587:25
billed	599:9 600:8	BRIGNOLE, BUSH	588:4,19
625:6 626:9	601:25	549:18	592:12,13
710:4	602:6,11	bring	593:11 594:5
billing	613:3	574:3,5	606:14
612:3 619:7	bone	596:11	609:25
626:8 628:8	648:10,16	617:15	610:21 611:2
629:1,10,22	books	629:19	613:11,15
630:9,11	584:24	640:21	614:7 619:16
645:8 707:24	645:10,13	690:24	620:19
Billions	655:15,21	732:23	689:16,17
701:5	657:4,16	Brittany	691:16 693:1
bills	658:25	548:20 552:8	721:13
590:17	659:11	656:11	728:7,25
624:13,14,	660:9,11	736:20 762:5	729:1
	676:8,11,15		739:14,15

June 27, 2022

740:2,8,12, 15,16,20 741:10,17 742:14,17,24 743:1,5 758:5 759:9, 14 businesses 619:6 buying 626:5 627:23,25 706:8 buys 628:3,5	called 553:15 573:10 595:18,19 598:10 calls 557:18 569:22 capable 656:4 678:10 capacity 565:3,4 592:21 caption 563:20 captioned 566:4,14 captioning 563:23 564:6 672:12,16,18 card 579:25 care 736:23 738:24 753:19 754:1 careful 700:25 cares 743:12 Carol 603:20 604:3,21 620:17,18 carrying 645:20 676:12,13 case 553:23 556:24,25 571:21 594:18 597:6 635:20 655:9 663:25 664:5 670:18 688:9 709:19 715:15,22	716:2 755:22 cases 557:1 573:5 715:25 cash 613:24 705:25 cashing 654:25 Castaneda 684:7 685:1, 17 caused 741:22 743:2 causing 625:10 Cerame 549:21 551:3,13,23 553:3,8 554:5 573:1 617:16 702:23 713:25 714:2,6,8 721:22 731:4 739:9,10,18 743:15 744:20 745:5,14,22 746:14,18,22 747:17,23 748:10,19 749:5,11,19 750:10,25 753:11,17 754:4 755:7 756:1,8,13 757:1,3,5 759:25 760:5,15,25 761:5,14,23 Cerame's 713:10 747:1 760:2 Cernovich 680:25 681:20	Cernovich's 681:4 682:1 certain 579:2 670:12 671:25 712:1 744:9 749:2 certainly 717:25 718:1 certainty 665:20 chance 688:22 change 603:13 677:6 changed 598:4 603:16,17 650:9 channel 681:7,8 700:5 character 550:6 charge 555:6 675:11 689:12 707:25 712:6 741:18 charged 712:17,22 charges 711:2 charging 713:1,4 chart 617:11,13 618:3,21 charts 616:21,23 617:5 618:7 619:4 check 702:2 735:1 children 598:16 599:8 605:19,20,22 615:7
C			
calculate 639:16 692:7 699:2 700:21 702:12 711:1 717:16 718:3 calculated 600:7 608:24 637:13,14 638:17 639:6 707:19 712:16 calculates 711:22 calculating 638:20 639:4 694:3 707:23 calculation 700:17 calculations 718:24 calendar 558:19,20, 21,22,25 call 558:22 559:3 568:1,5,8, 12,25 569:15 737:3 738:23			

June 27, 2022

Chris 551:7 589:22 614:22 712:11 743:16	clicking 696:19 697:15 704:6,7	colloquy 749:6	729:8,17 730:2,21 740:10,11 757:19 758:1,24 759:10
CHRISTOPHER 549:7	clicks 627:10 692:16 693:15	column 580:21 629:25 661:8,9,18, 23,24 662:16 663:2,4,11, 13,16 664:15,20,21 666:13 667:2	communication s 549:17 566:22 649:20 723:15 724:21 730:14,25
circumstance 740:5	client 718:1 729:7, 17	columns 669:1	companies 564:16 565:15 590:15 606:17,25 620:7 634:3 635:17 639:3 673:5
circumstances 712:1	clinic 714:22 715:4	combination 727:10	company 561:1 574:7, 11 632:9,15, 24,25 633:5, 6 641:3,5 725:18 728:5,15 730:21 734:23 739:24 754:13
citing 716:18	close 588:9 630:19 645:13 660:11 672:16 682:12,16	come 609:24 634:4 645:14 650:14 660:17,18 682:12 704:12 713:16 715:1 761:12	company's 574:9
claim 639:15	closed 563:19,23 564:5 645:10 655:15,21 656:14 657:5,16 658:25 659:11 660:8 672:12 675:1 761:18	comes 584:15 610:5 611:2 756:6	compel 634:21 635:7 637:4
claimed 635:8	closely 632:11	comfortable 734:16,20,22	compensated 654:24 666:16 668:24
claiming 609:5 623:21	cmattei@ koskoff.com 549:5	commenced 612:18 635:23,25	compensation 560:9 561:5, 13 562:4 563:15 572:6 573:14 595:10
claims 630:1	co-defendant 551:15	commercial 683:12	
clarify 621:3	co-defendants 551:16	common 717:11 739:14,23 740:6 741:24 742:22 743:23 745:1 747:2,4 753:3 759:19	
class 714:15	cogently 560:11	Communication 551:14 714:8 723:3,13 724:14,24 725:5,13,20 726:1 727:17	
classes 714:21	collaboration 723:12		
clear 561:3 581:22 591:3 593:7 599:18 607:2 621:17 636:25 639:19 664:3	colleague 551:9 715:13		
clearly 582:7	collected 560:18 561:4		
click 627:10 648:4,8,13 691:24 695:2,5 697:7 699:12,25 701:25 707:21 712:2			
clicked 697:21			

June 27, 2022

653:21,23	confused	693:17	conversation
655:2,7,11	579:13,17,18	694:4,25	555:21
656:4 657:7,	confusing	695:11	557:16,21
22 658:8,15,	628:11	698:10 699:4	558:6,10
21 659:9,22	Congress	700:3,12,14,	560:10
660:1,25	641:5	19,22 702:7,	568:14,21
664:25	Connecticut	11 730:12,	569:3,5
665:7,22	548:1,23,25	15,18,25	591:17
666:4,20	553:14,18	742:2,16,25	592:20 602:1
667:9,13	556:25	743:12	608:3 639:12
668:14	570:19,22	contents	640:6 650:5,
669:5,8,22	571:21 572:6	687:14	8 678:6
670:4	573:11	contests	691:8,13,19
completely	715:16	679:15	692:5 694:1,
636:6	connection	context	11,14,15
COMPLEX	623:3 641:16	649:23	698:7 703:16
548:2	654:11	703:15	704:10,13
component	670:18,23	749:22	707:17
646:6	720:12	Continue	710:24
composite	conscious	563:9	717:19
717:14	624:12,16	continued	718:10
comprises	631:22,25	569:10	721:14 735:8
662:19 670:2	633:3,25	597:21	737:4 756:6
computer	634:5,18	741:14	conversations
556:2 713:24	conservativel	continues	552:5 555:8,
concerned	y	645:2	11 557:15
669:7 687:6	682:11	continuing	566:25
688:15 735:4	683:19	645:7,18	587:16,18
concluded	consider	contractor	591:6 599:1
762:6	651:25	650:4,10	611:10
concludes	756:18	contradict	635:19
762:4	consulting	718:19	638:22
conduct	564:22 565:3	control	639:3,10,25
668:9	contact	621:1	640:5 673:14
conducted	564:24 565:6	730:11,22	691:11 715:8
553:2 577:23	689:14	741:14	717:1,21
581:24	contacted	controlled	718:25
582:13	559:18	580:6	719:14
conducts	contained	581:15,16	721:24
578:4,7	563:13 681:5	582:15	730:16
conference	687:19	632:20,22	conversion
557:17	contemplated	controlling	693:17
733:19	572:16	595:15	695:8,13
735:17	contending	632:20	699:6
confirm	643:15	controls	converted
556:12 565:7	content	565:15	699:24
617:6 696:15	692:1,9,11		coordination
			723:12

June 27, 2022

copied	10,24 606:2	686:2,7,13	counsel
685:4	607:10 608:4	688:13	550:4,10,15,
copies	609:6,10	689:2,20,23	20 552:8,21,
571:14	611:15,23	690:3,21	24 553:10
670:20	612:18	691:7,11,15	557:17,22
671:10,11	615:7,9,17,	694:4 696:21	558:11 586:7
copy	22 616:9,13	697:22	587:18
554:14	619:11,18,22	699:19	642:9,10,14
570:18,19	621:12,20	700:4,10,24	761:7
696:9,10	622:17 624:1	701:9,13	couple
711:15,19	625:2 629:2	702:12	555:7
corporate	630:5,12,23	706:2,13	557:15,23,24
572:5	631:7	708:13,25	558:16
595:15,18	632:17,21	709:9 711:3,	625:24 649:6
599:2 607:10	633:1,12,18	13,19 715:24	719:21
669:20	635:18 637:7	722:7,9,14	720:13 735:5
671:15 732:2	640:3,17	723:3 726:7	748:23 750:5
759:8	641:10	729:2 730:23	course
correct	642:11,14	731:20	613:10,14
556:17,24	643:3,7,9	732:13	614:7 619:16
557:5,11,12	644:2,8,13,	733:11,13	653:21
561:7 562:5	18 645:8	734:2 735:21	683:17 743:5
563:7 568:22	646:11,19	751:12,15	756:20,25
569:13,14,16	647:2,7,10,	752:16,21	760:13
571:21	13 653:12,22	753:2,24	court
572:21	654:12,16	755:24 756:7	548:1 551:1,
573:23	655:19	758:3	4,20 552:21
574:7,16	656:6,17,20	correctly	553:20
575:20,22	657:7,13	580:11	737:23
576:1 577:4,	659:23 660:1	711:24 718:9	cover
5,8,14,18,23	661:19	correlating	637:25
578:2 580:1,	662:9,12	698:9	655:13
4 582:2,20	663:8,18	correlation	create
583:22	664:8,13	724:5	560:7 742:25
584:16,21,22	665:8,13	cost	created
585:24	666:6,17,20	581:3 626:2,	560:9 561:9
586:2,8,19	667:1	5,13 628:16,	562:25 564:2
587:2,6	668:10,16,18	19 629:1	598:15
593:22	669:3,6,15,	630:22	603:15
594:16	17,19,22,25	631:5,16	622:25 688:6
595:2,11,16	670:4,12	645:7 646:4	708:24
597:3,8,18	673:11	707:21	creating
598:4	677:14,18,24	711:24,25	730:24
599:19,21	678:5 679:5,	costs	742:2,16
600:3,16,20	8 680:15	625:20,22,	credit
601:6,11	681:1,14,25	23,24 707:22	579:25
603:2 604:3,	682:22	710:4	627:17
9,14 605:6,	683:5,8		705:10
	684:1 685:10		

June 27, 2022

credited 706:3,4 707:9	618:6 619:14,25 678:2 679:14	day 555:1,3 572:22	615:15,22 618:23
credits 579:1 580:21,23 627:18 629:23 705:4,6,11, 14,21 708:19 710:8,10	686:12 687:1 690:3 730:25	588:18 589:7 606:14 609:25 610:2,6,21 611:2,25 619:5 620:5, 15,19 682:17 683:7,13 693:5,8 731:9 733:14 734:21 735:16	619:15 622:4 623:21 624:1,10 625:18 630:4,21 631:4,6,13 634:8,14 635:15 636:20 637:6 638:8,14 639:1,23 640:16 644:8 645:20,21,25 646:2,6,11 671:24 674:5,17 675:10 676:12,13,22 677:2
Criminal 715:16	Dan 649:13	day-to-day 621:4,11,19	debt-related 676:19
cross 761:16,19	Daniel's 570:8,11	days 571:11 572:15 608:23 688:6 691:16 692:23 693:1,9	debts 619:4 635:3 636:8 637:13 639:4
crossover 593:1	Daria 703:13	deal 666:2	decades 740:13,20 759:1
CRR 548:23	dash 557:3	dealing 671:2,6	december 623:22 624:21 625:1,15,17 629:8 630:10,21 635:14 636:20 644:13 645:24
cryptocurrenc y 653:25 654:5,20 655:1	data 563:17 688:5 690:6 699:17 719:24,25 720:7,21 721:3,20 722:3,13,17, 21	deals 728:18	decides 632:8
CT 549:4,13,19	date 555:4 557:24 558:5,6,7 595:5 599:21 638:2,18 641:1 645:6 659:23 674:18 686:24 687:5,19,21, 24 688:3	dealt 582:5	deciding 632:24
current 593:11,14 650:1,12	date's 558:8	debits 580:24 629:20,25	decision 624:12,16 631:20,23,25 633:3,22,25
customer 579:23 581:6 585:23 628:15	dated 566:4,15 608:8 677:20 731:11	debt 557:10 566:23 567:1 600:15,19 601:14,19, 23,24 602:4, 5,13,14,16 603:2 606:17,19,22 607:15 611:14 612:14,25 613:6 614:1	
cycle 738:14	dates 599:23 601:7 637:24 652:25		
<hr/> D <hr/>	David 563:16 620:17 635:11 641:12 643:6 647:1,12		
D109-317 641:4			
dad 673:16			
daily 607:9 609:15,17, 18,19,21 610:16 615:4			

June 27, 2022

634:6	552:7 553:1,	describing	dinner
deductions	5,25 554:10	564:5 575:25	736:21
665:1	555:1,2	586:13	direct
defendants	556:20,22,23	591:16	701:21
548:7,12,17	557:5	600:12	714:12
549:9 551:18	559:17,24	636:11	directed
553:6 554:4	561:14 562:9	647:16	699:24
685:10	569:21,23	671:23	Directing
defense	570:5,6,8,	675:20	680:17
652:23	11,15,19,25	711:17	directly
653:17	571:3,8	designated	556:1 564:3,
654:10,11	572:7,15,21	671:15	4 581:16
715:3,17	622:24 623:4	designee	591:19
defined	630:20	599:2 639:21	603:22
661:12	649:13	detailing	615:16
definitely	650:18	757:25	658:20
611:17	659:21,23	details	662:22
644:20	671:17	758:14	694:24 699:6
714:23	678:23	determine	702:7 725:22
743:19	695:21 720:5	692:15	disbursed
definitively	733:15	693:14,17,22	661:12
592:25	734:17,21	697:16	disclosed
delineated	735:11,16	determined	616:25
593:16	756:12,15	716:25	disclosure
delineates	761:10	723:18	567:14
607:25	762:4,6	determining	discounted
delineation	depositions	717:21	711:6
607:3	570:2 696:12	723:14	discuss
delivery	741:9	Dew	564:15
589:4	derive	649:20 650:6	566:8,10,18,
demographics	721:13	Dew's	20,25 567:1,
719:23	derived	571:3 650:1	24 568:9,10
deny	700:21	difference	630:18
719:7	describe	665:18	671:14,22
department	712:15	different	677:7,17
694:20	described	575:25	720:3 756:19
depend	562:2 563:6,	648:14 677:5	discussed
701:1	12 564:19	680:5,7	563:18,19
depo	571:6 588:1	683:19 684:1	661:7 671:20
653:19,21	600:18	685:21	716:6 756:10
deponent	635:16	703:18 715:4	758:24
550:22	687:18	721:11,17	discussing
deposed	710:25	728:15 745:7	681:12
570:18	711:21	difficult	733:22
deposition	712:13	564:9 678:11	discussion
548:20	727:21	703:5,7	632:12
550:6,21	761:11	717:6 737:7	638:25

June 27, 2022

723:16 737:4	695:17,23	dozen	684:5,13,16,
739:12	696:2,7,14,	589:7	17 685:5,9,
discussions	18 697:18	draft	14 686:11,24
638:12	698:1,8	715:19	687:4,15,18,
640:15	712:8,12	drafted	19,23 688:3,
671:19	718:5,6	643:2	7,11,21
disentangle	documentation	draw	689:5,7,15
673:6,8,9,	620:10	637:23	690:4 718:6,
10,18	documented	661:23	7,8,9 736:2
disorganizati	601:18	662:9,15,19	e-mailed
on	635:22 636:8	663:18	567:5,6,8,9
741:23	documents	664:1,2,16	616:24
disorganized	557:9 567:1,	665:13,15,25	617:17
742:13	4 568:9,22	667:11	696:12 733:6
dispute	590:19 599:1	668:15,21	e-mails
679:12	600:4 601:6	drawn	690:1 732:16
683:24 684:2	605:13	666:11,25	e-tran
687:2,4	620:12 624:3	draws	551:22,25
690:7 724:8	629:13 635:1	661:8,10,11	earlier
distinct	701:4 755:12	662:21	558:15
587:9,11,12	757:25	665:10	583:21
588:1	761:11,15,20	666:14 667:6	591:16 593:9
distinction	doing	drew	599:19
591:23	556:11	663:6 664:12	616:14 618:4
divide	592:12	666:15	623:8,18
609:24 610:5	597:13 693:6	Drive	644:11
611:1	698:21 721:8	553:13	647:16,19
division	742:16	driving	654:20
693:6	dollar	698:15,16	655:15
DOCKET	695:12	drove	660:25
548:2	dollars	588:14,16	665:11
document	600:7 668:25	697:4,10	671:23 705:3
566:3,6,8,	domain	due	717:7 724:15
14,16,20	648:22	646:14	745:25
568:24	donations	672:23	earned
569:9,11	652:22	duly	661:15 665:9
596:18	653:11,25	553:16	699:2
597:12,13	654:2,5,10,		easier
603:3,4,22	15 655:1		596:4
604:6 608:10	double	E	eastern
618:2,3	683:9		552:10
642:25	doubt	e-mail	eat
643:24	718:16	549:5,14,20	588:21
644:12	740:16,18	567:11	economic
664:4,5,6,12	dough	573:21	727:7
679:22	654:20	617:22	editorial
680:10 688:5		677:11,20	730:11
		678:4,12,18	

June 27, 2022

effect 701:23 711:7	689:2 723:2, 6,8 735:6	655:17 674:21,22, 23,25 737:3	entities 585:8 588:2
effective 604:17,18	751:7 757:6, 7	738:23	592:3 630:19
effort 638:2 673:14	employees 583:3,6,9,15	ended 733:19 752:6	652:5 732:2
efforts 593:15	584:20,23	engaged 583:15	entitled 676:3
606:23 607:3	585:4,24	587:24 651:3	entity 595:16,18
635:6,21,23	586:1,12	ensuing 604:12	607:10
636:7 637:4, 5,21 645:12	587:13,15	entanglement 606:24 634:2	entry 558:20
673:6 678:25	588:4,23	635:17	equally 730:20
eight 670:25	589:11	636:3,10	equates 609:22
eight-year 666:11	591:15,19	673:5 675:20	Erica 548:4 552:11
eighth 698:2	592:2 593:1, 4,10,20,24	entanglements 636:4 741:12	ESQ 549:7,15,21
either 557:4 571:25	594:6,7	enter 743:23 745:2	essentially 587:23
572:21	730:17 731:1	747:2 761:23	681:23
582:8,9	732:17 744:8	entered 609:5 610:12	684:22
590:24 632:5	750:7,8,13, 16 751:6	644:24 709:9	734:10,25
647:11 654:7	760:4,9,11, 14	743:25	established 620:5
660:9 724:13	employing 592:21	744:19	estate 597:25
elaborate 745:15	employment 650:9 744:10	745:12,21	598:1,12,13, 17 599:7
electronic 625:6 718:13	749:21	749:10	602:8
Ellison 589:22	750:19,22	751:7,14,21	estates 598:18
else's 681:7	751:13	753:21	estimate 716:11
employ 583:7	EMRIC 548:7,12,17	760:13,22	estimated 716:12
employed 565:4 591:19	549:10	enters 747:15	estimates 717:5 755:23
593:24	encountered 699:18,20	entire 612:4,20	estimation 716:10 717:5
594:16	700:22	613:1,3	estimations 716:10 717:2
650:16	701:18	620:19	723:2
679:10	702:10	624:14	et al 548:4,7,12, 14,17
employee 591:22	end 580:25	678:10	
592:10,13	600:5,7	741:24	
594:4 679:4	606:9 607:24	entirely 725:3	
684:6,7	611:12,18	entirety 624:14	
	622:12 628:6	625:2,4	
	637:14,21	633:6,19	
	638:17,20	634:1 670:2	
	639:7,11		
	640:7 644:20		
	645:17		

June 27, 2022

everybody 551:5 591:3 740:4 762:2	executed 582:1 610:3 635:6,16 637:20,24 643:24 673:11 674:4 676:17	expected 590:25	722:12 729:19
everything's 742:18	executing 673:17	expenses 564:5	735:15 740:19 747:14
exact 558:5	execution 641:9	experience 755:23	facts 618:15
exaggerate 719:15	exercised 595:14 730:11	expires 610:10	factual 618:17,20
exaggeration 719:16	exhibit 554:15,19,23 580:18 608:2 617:10,12 623:13 660:23 677:8 679:20 688:19 691:2 702:15 705:3 737:15,16,23 738:1 739:3,4	explain 554:24 560:2 561:10 562:3,8 563:1,5 661:6 686:17	failed 553:20
EXAMINATION 554:6 714:6 731:7 739:10 743:21 757:5 760:1	Exhibits 599:19	explaining 557:19 608:5 692:19 703:17,20	failure 646:3
examine 696:14	exist 601:6 743:4, 6,7,8 746:19 748:9,14 757:24	explanation 660:7	fair 594:14 664:9 679:11 683:3 693:25 694:6 715:7 742:1, 15 751:11 756:18
examined 553:19	existed 709:20 760:8	expressly 712:21	Fairfield 548:22 549:3
examples 636:10 745:16 748:23 749:22 750:5	existence 568:15 600:2	extent 588:3 697:21	Falzarano 680:6
excellent 742:23	exists 574:11 654:13	Facebook 680:25 701:2,5	familiar 574:6 596:18
exception 710:12 711:4	exit 703:18	facility 586:18,19 590:12	familiarize 677:13
excess 740:17	expect 573:13 605:1	fact 582:9 590:23 593:10 618:14 638:6 641:23 655:7 663:25 664:5 665:17 675:21 676:25 680:14 687:17	family 736:22 738:24
exchange 733:22 759:18	expectation 707:7,8		far 562:18 571:19 588:10,11 593:18 594:18,20 612:17 659:18,19,20 669:7 678:12 687:6 688:15 694:19 699:7 719:9,25 735:3 746:1
exchanged 649:20 706:10,11,12			FBI 698:5
excluding 662:19			
execute 648:16			

June 27, 2022

February	559:16,20,25	673:1,7	focused
733:12	591:1 593:14	675:5 676:17	612:12
735:15	606:24 634:2	691:4 697:8	613:23 631:1
736:12 738:5	635:17	698:21	742:1
federal	636:2,3	714:10,23	follow
663:12,17	671:16	715:14,18	743:18
664:1,15,23	673:4,18	716:5,6	following
fee	741:11 742:7	736:11	676:16
572:16	financially	745:10	693:25
feel	552:16	five	follows
622:1	find	598:1 614:22	553:19
fees	596:7 724:9	flat	food
711:22	736:7 739:1	572:9,16	574:18,19,24
712:16	743:3 747:8,12	Floor	575:1
figure	fine	549:13 641:6	force
610:25	551:25 666:1	Flores	591:22
622:13	728:23 730:8	675:17	592:10,13
673:8,12	749:16	flow	594:4,11
691:20,22,25	finish	616:20	foreclosed
695:12	558:13	618:25	672:18
736:1,3	560:16	619:1,9	forgot
738:9	561:21,24	620:20	736:23
figures	587:3	flowchart	fork
661:9,24	finished	596:3	594:14
712:3	572:24 573:2	613:20,21	form
file	firearm	614:10,14	550:16 554:2
657:15	689:11	flowing	578:10
737:17 738:2	firearms	613:24	587:19 744:7
739:5	689:22	614:5,7	759:16
filed	first	616:9,16,19	format
656:16,23	549:13	620:1,5	680:5,7
657:1,5	553:16	flows	formation
670:22	555:12,15	613:15	603:4
fill	567:3 570:15	615:21	formed
569:11	574:6 595:14	619:16	591:22
filled	600:5,6	fly-by-the-	592:11
750:20	603:11	seat-of-your-	595:4,14
final	607:23	pants	596:1 597:16
660:17	608:8,13	742:12	599:6 600:3
finalized	622:5,13	fly-by-the-	601:10
660:15	635:5,15	seat-your-	602:19
Finally	637:13	pants	forms
688:18	638:16,17,21	741:15	669:14
finances	639:4,7	FM	750:21
592:24	640:6,21,25	688:12	formula
financial	641:1 645:16	focus	707:19
555:10	650:6 672:21	735:14	710:25 712:5

June 27, 2022

713:4	7,21,25	641:2,10,15,	700:2,7,16,
formulate	587:4,10,15,	20 642:1,6,	20 701:12,17
598:17 689:9	22 588:3,11,	12,13,16,21,	702:9,11
formulated	12 589:10	24 643:15	704:16,17
598:5	590:6,17,23	644:12,15,	705:4,7,8,9,
forth	591:23	16,24 645:6,	11,13,25
609:23 655:8	592:5,12	23 646:6,17,	706:6,9,14,
663:11	593:4,23	18 647:6,21	17,19 707:3,
forward	594:1,9,14	648:2 650:1,	4,14,15
599:8 618:24	596:19	12,16,22	708:1,4,7,
619:6 673:21	600:16	651:2,5	11,16,18
674:14,18	606:6,14,16,	652:3,21	709:7,8,18,
675:2,9	18 607:7,8,	653:10,14,	24 710:7
738:17 739:1	12,13,15,19	16,25 654:6,	711:1,10,22
four	608:9,11	9,18,23	712:5,15
598:2	609:4 610:11	655:6,10,18	717:7 718:2
683:10,14	611:4,13	656:2,3,10,	719:1 720:2
fraction	612:3,6,17,	19 657:1,6,	721:2,19
692:23	19,23 613:2,	11 660:8	722:2 723:12
frame	9 615:15	662:22	724:24 725:4
693:10	616:17	663:24	726:10,12,
704:21	618:15,18,	665:7,20,22	13,21,25
free	21,22 619:7,	666:5	727:9,15,18,
549:10	11,13 620:3	667:10,14,	22,25 728:9
555:7,9	621:9,18,22	19,21,23,24	729:7,16
557:10	622:5,11,16	668:5,14,20,	730:11,14
559:11,21	623:21	23,24 669:7,	731:12,13,
560:4,20	624:9,13,21	16,19,20,22	20,22,25
561:7,12	625:1,5,10,	670:8,11,13,	732:4,6,10,
563:11,22	14,18 626:4,	21 671:2,6,	12,17 739:19
564:16,20,22	10,11,18,20	24 672:3,21	740:11
565:2,5	627:15,17,	673:19	741:7,13,25
566:11,23	20,23 628:1,	674:3,9,19	743:9,23,25
572:4 573:25	8,9,13,18,	675:5,21,25	744:19
574:3,12	22,25 629:5,	676:1,7,18	745:2,12,19
575:2,5,13,	7,22 630:2,	677:7 678:1,	746:17
19,22,23	8,11,20	8,21 679:11,	747:2,15,21
576:8,13,19,	631:4,5,7,	18 680:11,13	748:17
23 577:2,6,	12,15,16,20	681:24 682:3	749:9,25
10,12,18,21	632:2,13	683:23	750:8,15
578:3 579:1,	633:11,17,	684:12	751:5,14,21
2 580:23	21,22 634:4,	685:14	752:1,15
581:1,15,17,	7,12,20,21	686:10,11,23	753:1,20
22 582:8,11,	635:6,7	687:6	755:13
15,18,22	636:3 637:3,	688:11,15	757:7,12,18
583:2,9,15	5 638:6,10,	689:1,17,19	758:1,4,9,
584:6,14	12,25	690:5,15,20	16,23 759:10
585:4 586:1,	639:15,21	692:1,8	760:4,9,14,
	640:2,14,16	698:22 699:1	21

June 27, 2022

freeworldoutlet.com 576:21,25	653:12,17 654:2,10	Genesis 549:17	705:5,10,21 708:20 720:4
Friday 558:25	funded 599:12,13 601:10	551:14 714:8 723:3,6,9,13 724:14,20,23 725:4,12,18, 20 726:1,8, 20,21 727:1, 9,15,17 728:6 729:8, 17 730:2,21, 22 731:2 740:10,11 757:19,25 758:24 759:10	748:4,23 749:17,21,22 751:5 762:5
friends 728:21	future 674:15		Givesendgo 653:6
front 556:2 562:12 623:11 640:23 677:10 684:5 737:9 738:22	<hr/> G <hr/>		giving 572:20
Frost 690:17,21	gained 667:22,23		gleaned 668:4 686:20
Fruge 589:24 652:5	gathered 567:14		gleaning 684:15,17
Fruge's 650:12	gave 556:23 586:3 660:7 669:10 703:12 745:16	gentleman 559:4	global 695:1
FSS 703:1,10	general 560:6 564:1, 10 620:9 655:20 666:14 667:1 668:5,10,13 672:2,8,22 673:2 702:4 707:3 708:15,18 727:13 731:22 747:5	gentlemen 682:8	goes 585:22 593:19 600:5 678:12 683:16 732:22
fulfill 584:9 585:5 591:4		getting 579:13 628:13 631:11 683:4,7 700:16 733:22 734:13	going 551:1 555:2 559:17 560:1,2 561:23 574:5 579:6 581:5, 9 587:18 593:23 594:19 596:7,22 599:8 612:24 613:3 618:24 620:11 628:14 638:21 639:16 640:25 649:7 650:6 658:10 673:12,21 675:9 680:18 682:5,7 698:14 713:10,18 714:3 730:24 734:14 740:3 745:14 749:14,15
fulfilling 585:22 594:4		give 556:9 558:24 561:1 595:5, 13 618:13 622:7 649:9, 23 696:9 721:1 728:4 743:24 744:17 745:3,10,19 748:21 749:8,15 750:14 751:7,20 753:19	
fulfillment 580:22 581:2 583:23 584:3,21 585:9 586:13 587:14 591:15,18 594:3	generally 583:25 717:15		
fulfills 583:25	generate 606:2		
full 631:17 637:6 645:7	generated 612:13 642:25 643:1 692:16 693:15,17 696:22 708:17	given 564:23 579:1 599:24 620:23 627:17,18	
function 585:5,6 587:24 589:1 685:6,7	generating 606:3,4,5 615:3		
functioning 741:19			
fund 603:6			

June 27, 2022

761:22,23,24	756:18	Hanson	624:20
good		685:4	helps
554:7,8	H	happen	585:20
649:3 650:15		759:19	Henry
710:14	half	happened	689:10,13,18
726:19	589:6 652:9	558:6 592:25	690:8
741:10	682:9,17	593:21 634:6	hereto
742:14,24	683:9 737:2	happening	550:4,10,15,
743:1	hand	558:7 611:11	20
goodness	556:3	638:23	Hey
714:4	handed	640:10	627:25
goods	554:14	706:24,25	736:20
646:4	handle	hard	hierarchical
Google	584:21,23	614:12	634:3 741:13
695:7,9,22	585:24	696:10	hierarchy
696:2 697:12	586:23	723:23	740:1 747:6
703:20,22	587:23	Hartford	hired
704:8 721:11	handled	549:19	592:2 750:20
governing	579:1,11	Haven	hires
732:11	642:2 690:20	549:13	760:23
753:1,15	handles	he'll	hiring
grab	577:25	742:9,10	760:13
733:9 735:20	578:24	head	historically
738:5	583:21	629:9 636:13	742:6
grabs	584:3,11	653:2 690:10	hold
733:6	628:6	headed	595:22
graces	handling	555:13	598:20
650:15	579:3,7	header	673:23
grade	581:2	556:19	737:14
671:18	handwriting	HEALTH	holdings
graduation	703:4	549:11	574:7 596:24
715:6,11	handwritten	hear	597:2,7,17
great	555:23	612:16	641:4,13
558:23	569:18	heard	home
562:7,16	690:25	687:10	648:7,9
715:12	hang	hears	697:8,11
759:15	599:15,25	697:6	homicides
growing	600:10	held	698:6
741:14	608:18	548:2 552:5	honest
guess	618:11	597:2,18	576:15 603:7
579:12	625:25	601:15,23	605:17 726:8
596:16	627:1,22	help	728:3
625:16	629:24	594:23,25	honestly
629:11	636:24	597:14 617:2	555:25 636:1
672:25 675:4	661:21 706:7	664:6 703:15	662:2 708:14
701:1 719:10	709:5	helpful	honesty
730:7 744:23		580:16	573:16

June 27, 2022

Hook 677:18,23 692:1,9,10 694:25 695:4,11 696:20,24 697:6,19 698:10 699:3,18,21 700:3,12,19, 22 701:13 702:7,10	725:15,23 ideas 736:25 identificatio n 554:20 617:11,13 738:2 739:5 identified 668:13 697:20 755:16 identify 551:6 566:13 608:19 747:20 751:11,16 757:6,12 identities 562:20 III 548:3 immediately 611:5 important 630:17 impression 614:15 impressions 701:5 include 682:21 included 563:25 567:12 661:23 662:8 663:4,18 664:1,15 665:13,25 666:22 672:8 700:12 705:6 713:5 includes 668:21 including 661:13,15,16 662:23	665:14 682:1 income 605:25 606:2,3,4,5 611:22,24 612:12,16 613:15,19,24 614:5 615:3, 5,6,10,12, 14,16,18,20 616:8,12,16, 18 618:5,19 619:1,8,10, 12,15,20 620:4,10,11, 21,25 662:24 667:17,19 669:15,19 670:21 671:3,7 690:12 694:3 696:22 713:2 755:12 Incorporated 551:15 714:9 incredulous 743:8 indeed 686:25 independent 581:20 650:10 668:9 indicate 555:13 556:11,20 561:15 590:19 591:8,9 663:17 691:14 indicated 558:15 559:15 640:1 676:5 716:9 718:2 indicates 596:24 623:24 624:4	688:10 indicating 672:7 692:23 indication 721:1 indications 671:25 indirect 605:9 indirectly 604:13 individual 551:11 560:14 686:25 732:18 industry 716:25 717:11,15,16 722:22 756:21 infer 618:16 inference 638:1 inferences 637:23 639:20 information 555:17 556:5,9,14, 16 557:3,13 559:14 560:1,6,10, 18 561:2,6 563:5,13,22, 25 564:1,23 565:10 571:20 587:8 656:9,12 657:10,25 658:8,15,21, 24 659:8 660:4 665:12 669:10,13,21 670:3 679:15 684:21
hoping 689:18 hosts 575:16 hour 565:22 652:9 737:2 hours 588:19 650:8 683:14 698:13 house 584:8 housed 588:11,12 houses 574:12 583:24 housing 625:22 huge 683:18 hundred 650:4 hundreds 697:13			
I			
icon 688:10 idea 603:1 693:10 704:25 716:24			

June 27, 2022

685:16	578:8,19	605:9 607:25	625:8,9,19
686:16,18,20	579:8 580:8	608:23	633:23
687:7 690:23	581:12,25	609:8,9,14,	673:22
703:12	582:13 583:1	22,23 610:14	674:16
718:18,20,25	627:3 699:16	620:24,25	invoices
719:1,6	initial	632:17,20	619:8
735:2 756:5,	568:13	633:14	625:10,14
10	initially	643:13 644:1	630:22
informed	581:6 708:11	646:10	636:15,17
560:25 565:8	initiated	726:15	674:20 675:6
587:12	606:16	interested	676:10
592:11	initiation	552:17	707:10,14
informs	594:2 606:15	interferes	709:24
678:1	611:22	742:16	710:2,5
Infowars	inquire	internal	invoicing
549:10,11	731:14	584:25	626:11
575:9,16	inquiry	585:2,14,18	627:20
653:17	715:17	671:19 681:4	628:23 629:7
654:15 679:4	instructed	731:3	630:10
684:6,7	657:21,24	internet	631:15 636:6
691:22	660:3	682:21	involved
701:7,11,19,	instrument	683:17	565:17
21 704:8	557:10 603:1	interpret	583:3,10
Infowars.com	605:12	664:4 703:4,	586:9 588:2,
575:14,20,	647:7,10	6	4 652:5
22,23 576:1	integrated	interrupt	689:5 718:10
578:5 627:9	720:14	617:16 645:4	731:2 742:6
647:25	intend	interview	involvement
648:10	736:16	555:14,18	565:14
696:20	intended	556:6 557:4	586:25 587:4
697:20 698:3	735:3	interviewing	621:11,19
Infowars.com.	intention	740:3	755:22
575:7	592:23	introduce	involves
infowarsshop.	inter	589:17,18	585:10
com	580:18	introduced	involving
576:12,18	interacted	589:14	559:3 642:8
577:12	715:7	intuit	IOU
578:9,20	interactions	618:16	706:2
579:9 580:8	741:16	intuiting	iphone
581:25	intercompany	747:13	733:9
582:14 583:1	580:13 623:7	invoice	issue
627:3 699:16	interest	573:19 625:6	662:11
infowarsshop.	590:7,9,20,	626:12 631:2	695:21
com.	24 591:10	675:8 708:8,	700:16
581:12	595:15,21	17	715:18
infowarsstore	597:3,18	invoiced	issues
.com	604:12,21	573:21	559:25
577:12			560:19 561:2

June 27, 2022

562:8 630:18 734:14 741:11 743:2 761:18 item 563:6 564:15 585:16 699:13 itemized 556:13 items 630:9 691:24 704:6 IW 618:2	551:15,18 552:12 553:5 554:3 555:3 563:15,16 587:17,20 595:14 597:8,18 599:3,5 603:20,22 604:2,3,13, 19,21 605:5, 8,18,24 610:2 615:9, 10,17,18 616:8 618:21 619:20 620:17,18,24 621:10,19,23 632:13,16, 19,20,24,25 633:9,11,20 635:11,12 641:9,12 642:2,13 643:6,24,25 646:17,18 647:1,6 651:1 653:11 654:14,24 655:19 656:5,22 657:7 658:8, 15 659:22 661:13,14,16 662:5 663:5, 7 664:11 665:8,22 666:25 667:9,14,24 668:14,24 669:5,15 670:12 673:16 677:17 679:7,12,17 680:2,14,21, 24 681:3,5, 12,19,23 682:7 683:3	685:10 686:1,5 687:1 690:2, 19 696:23 697:1 699:7 717:19,20 718:4 719:1 726:10,13,14 727:10,18,23 728:9,18,20 732:18 733:4,12,17, 22 734:1,19 735:1,19 739:24 740:12 742:1 743:10 756:7 757:18 Jones' 560:9 647:13 657:22 663:11 Jones's 561:5,12 562:4 565:14 570:25 571:6 595:10 597:25 598:12 603:20 615:6 653:21 655:11 659:9 660:25 663:17 666:4 669:21 670:6,17,22 671:1 683:24 689:23 690:9 742:15 Joseph 549:24 JPEGS 733:10 Judge 582:6 June 548:25 552:9 558:16,18,25	560:24 680:1,14 683:25 <hr/> K <hr/> keep 596:22 682:5 695:20 Kelly 563:16 661:13,16 662:23 663:1,7 681:1,14 KENNETH 549:21 kept 761:10 kind 560:11 569:9 586:12 597:14 614:19 630:17 635:20 639:8,20,22 650:14 716:19 739:25 741:15 743:7 750:20 752:23 knew 558:7 714:12 know 554:15,16 556:2,8 561:8,9 562:25 564:21 565:4 570:7,14,15, 17 571:23 573:15 574:20 575:3 576:5,10,13, 18 577:5,9, 19,22,24
<hr/> J <hr/> Jacqueline 732:21 James 723:6 January 645:5,24 646:3 675:4 677:20 678:5 679:3,12 Jay 732:18,19, 20,21,22 Jim 677:16 job 737:7 Joe 552:13 John 677:14 679:4 685:4 718:5 John@ infowars.com 677:14 joined 551:8 Jones 548:7,12,17 549:10			

June 27, 2022

581:6,18,19, 23 582:9,16, 19,21 583:8, 17,18,24 584:17,18,25 585:2,13,19, 20,21 586:9, 14,22,23 589:3,18 590:4,5,13 591:11 592:14,15 593:4,5,18, 19,25 594:10,18 595:6 596:5 597:16 598:25 599:2 601:20,24 602:3,5,8,20 603:8 606:24 609:19 610:4,5,16, 24 611:6,16, 17,18,21 613:17 614:12 616:14,15 621:2,6,10, 16,22,24 622:1,18 624:2,12,17 625:3,16,24 627:4,5 628:20 630:16 631:15,22, 23,24,25 632:9,10,11 633:2,3,4,24 634:5,6,11, 17 635:25 636:1,12 638:8,20 639:2,17,18, 24 640:9,11, 18 641:19 642:4,15,19, 23 643:4,11,	19 644:19, 20,21 647:8, 11,14,15 648:21,22 649:25 650:9 651:12,22 652:6 653:1, 4,5,7,8,18 654:7,21 656:19,24 657:8,10,12, 24 665:3,11 666:21,25 667:18 669:18 670:6,8,10 671:9 673:3, 24 675:7 676:11,25 677:1,3 678:6,24 684:15 685:2 687:23 688:2 689:12 690:8,10 691:22 693:3 695:17 696:3 697:3 698:2, 12,24 699:22,23 700:1 701:23 702:1,2 704:5,23 705:1,14 706:8,22,24 707:6 708:2, 14,15 709:10 711:4,14 712:7 713:6, 7,10 714:7, 10 716:16, 18,19,24 717:10,17 719:9,13,14, 18,20,23 722:16,21 723:11,17 724:13,23 725:12,18,	20,23,25 726:4,6,8,22 727:1,4,6,7, 16,21,25 728:2,4,6,7, 14,17,19,20, 22,24,25 729:3,4,7, 10,17,23 730:2,9,10 731:9,21 732:25 733:24 734:17,22,24 735:6 736:24 737:1 741:8, 14 742:7,21, 22,23 743:3 744:4,6,23 746:5,8,9, 10,12 748:12,25 751:9 752:5, 18 753:14,16 754:6,7,22, 24 755:3,11 757:11,17,24 758:14 759:14 760:19,24 761:2 knowing 701:18 knowledge 664:7 723:3 726:16,17 740:13,14,21 Koskoff 548:21,22 549:3 <hr/> L <hr/> labeled 585:17 labels 589:5	lack 740:1 741:12,23 Ladies 682:8 Lafferty 548:4 552:11 Lamar 641:3 landing 697:12,14,15 698:3 large 725:18 late 600:19 731:9 733:13 law 598:18,23 714:13 lawsuit 594:3 721:4 Lawyers 715:17 leases 584:18 586:18 ledger 560:6 564:1, 10 622:18,21 655:20 667:1,6 672:2,8,19, 22 673:2 705:1 707:3, 11,12 708:15,18 749:24 751:25 ledgers 622:17 666:15 668:5,6,10, 13 672:8 676:4 709:2, 13,19,20 710:1 727:13
--	--	--	--

June 27, 2022

left 693:4 735:19	links 576:2 647:21 687:23 688:2 692:16 693:15	little 562:17 568:18 593:17 596:22 603:25 628:10,11 652:11 680:18 682:5 689:25 736:25 742:13	708:14 715:20 732:15 738:16 742:9
legal 552:14,19 652:23 653:17 654:9,11 715:21	Lisa@ everydaymedia 689:8		looked 599:19 658:3 710:3
legers 709:4	list 556:13 698:13 717:4		looking 580:12 581:7,19 614:12 618:20 619:3 623:7 629:12,15 630:13 639:14 644:11 690:1 693:3,12 699:14 705:3 712:12 717:12 726:18 738:25
LEWIS 549:18	listed 630:5,6 655:2 661:8, 23 662:16 663:1 664:11,20,21 665:12 667:1 668:18 671:16 678:23 713:2	live 682:21 683:17	
liability 641:3,5 663:11,20 672:23		LLC 549:10,11, 12,18 574:7 597:2 641:2, 5,13 643:20	
license 548:24		located 552:14	
life 589:15	listen 678:8,9 717:8	logged 720:11	looks 555:12 608:13 678:12 681:2 682:15,23 684:24 686:20 689:5,9,11, 13 735:22
likes 692:15	listener 678:3,15 679:14	long 565:21 569:5 573:3 592:20 597:22 704:6 740:8	
limited 574:7 641:3, 4,5,13	listeners 682:13,17 683:5,8 686:12,14 687:1 688:12 690:3 725:22	longer 586:10 713:18	
line 691:4 741:21		look 558:19 566:13 578:25 581:7 582:4 600:4 613:16 614:10,13,14 653:19 663:23 678:14 687:15 688:21 691:13 697:11 702:24 703:21 705:4	lose 713:23
lines 703:3	listening 678:10		loss 676:5,6,7
lingering 568:11	listing 596:22		lot 561:24 634:2,4 635:16 650:14 673:4 697:2 714:11 719:24 725:19 735:9 741:11 742:22,23 743:2
link 575:8,9,10, 16,25 627:7, 11 647:22 648:4 692:10 696:19 699:6,10,12 700:1 701:21 702:3,6,13 723:18 724:3	lists 695:11		
link's 701:24	literally 685:22		
linked 584:6 647:24 697:9	litigation 548:2 622:16 649:21 654:12 708:25 720:12 743:3		

June 27, 2022

low 742:10	make 551:4 558:9	manager 589:2 643:9, 12	589:17
lunch 588:20,22 589:8 649:8 651:13 652:8 733:13,18,23 734:13 738:16,25	561:2 564:17,25 578:11 580:10 593:15 606:23,25 607:9 609:13 614:14 617:19 618:14 621:17 635:21 636:7 637:5 660:16 664:22 675:3,6,8 676:15 696:1 700:17 731:15 734:16,19 735:2 742:17 749:4 752:22,24 758:13	managing 587:5 641:20 manufacturer 689:10 March 554:11,12 555:14 571:10,11,12 Mario 549:21 551:13 553:8 713:12,21 714:7 739:8 746:20 Mark 555:8 557:16 559:4 560:13 562:22 752:11,12,14 marked 554:15,20 617:7,11,13 738:2 739:5 market 703:11 marketing 555:6,16 556:4 562:21 563:11 651:17 689:6 694:20 702:25 705:6 719:25 720:6,10,14 744:4,6 746:6 749:23 751:18 marks 691:7 material 699:18,21,25 701:19 734:24 743:4 materials	math 604:23,24,25 644:3 Mattei 549:7 551:7, 22 552:24 553:22 554:6,22 566:2 567:10,16 596:11,13 614:24 615:2,24 616:6 617:3, 9,14,23,25 618:1 623:13,16 624:7,8 646:22 649:5,11 652:8,20 684:3,4 687:11,12 688:18,20 690:24 691:1 695:16,19,25 702:20 710:16,22 712:8,13,19 713:9,15,20 714:1 716:21 719:4,11 720:17 721:5,21 722:4,18,23 723:4,20 724:10,16, 19,21 726:2 727:11 731:6,7 732:23 733:2 735:23 737:22 738:3,20 739:3,6,17, 21 740:24 741:5 742:3,
Lydia 708:3	614:14 617:19 618:14 621:17 635:21 636:7 637:5 660:16 664:22 675:3,6,8 676:15 696:1 700:17 731:15 734:16,19 735:2 742:17 749:4 752:22,24 758:13		
M			
made 564:5 576:3 585:23 593:15 606:23 607:3 611:17,18 612:2 619:15 620:2 631:20 633:22 635:7,21 636:7 638:2 641:1 645:13 651:23 653:25 663:19 672:17 674:11 675:12 677:2 678:25 694:24 727:14,15 748:17 750:1 753:9,16 754:18	makes 566:11 596:4 688:8 717:2 making 611:4 612:5, 19,23 613:2, 10 616:17 637:21 638:1 644:16 672:9 673:21 674:15 675:11 676:20 723:10 730:24 752:3,5,15 man 589:14 manage 591:15 592:1,13 management 731:19 732:6		
mail 589:3 734:10			
maintain 591:23 594:10			
maintained 594:3			
majority 632:20,22,25 731:23			

June 27, 2022

19 743:19,21	650:24	681:14	609:5 610:13
746:15,20,	651:1,8,20	Melinda	622:12
23,24 748:20	655:20	675:16,17	634:13
749:7 751:1	660:12,21	member	636:16,19,
753:18	663:12	641:20	20,23 638:22
755:2,8	666:1,10	701:11	639:12 642:8
756:4 757:2,	667:2 672:5,	715:16	644:8
20 758:10,18	24 673:20	memo	645:20,25
759:12,21	675:7,13	734:1,4	653:24
760:1 761:4,	676:21	735:19	654:19 662:8
9,22 762:1	684:18	757:18,22,23	663:1,3,4,5,
matter	695:10 697:2	men	7 664:12,17,
552:11 700:8	700:5 704:19	748:8	20,23
713:23	705:14	mentioned	666:11,17
759:19	706:5,8	635:13 674:2	676:24
761:16	709:16 721:7	719:19	678:3,17
MATTIE	724:3,9	Merchandise	679:14
737:20	728:10	574:21	681:6,7,8,9,
maximize	730:13 735:7	message	16,20,24
700:8	748:9 751:3	732:18 733:5	682:13,16
mblumenthal@	756:12,15	735:20	683:4,7,13,
koskoff.com	meaning	messages	19,20 684:1
549:6	634:24,25	732:15,24	686:12,14,25
mcerame@	645:5 734:19	733:3 735:15	688:12 690:3
brignole.com	means	met	691:15
549:20	605:22 640:9	572:7 590:2	692:23,25
mean	664:2	671:4 694:14	693:9 716:13
562:22 579:6	meant	735:9	mind
584:20,25	553:23	meta	587:25 715:1
585:13,14	609:17	688:5	732:24
588:12	measuring	method	mindful
590:9,10,14	756:22	706:20	618:14
592:3	media	716:20	Minimally
593:13,14	700:4,9,22	methodology	726:24
594:1	701:12,19	716:16	minus
598:13,14,	718:13	717:11,12	630:24 665:1
15,17 602:7	meet	methods	minute
609:24	589:16	721:11	588:10
611:24 612:2	733:24	Michael	677:12 684:9
613:21	734:13	680:24	685:11 750:6
620:2,4	735:16	Midas	minutes
621:2,3	meeting	728:15	569:6 652:10
624:11	560:24	middle	714:4
629:15 632:9	565:21	703:24	mislead
633:25	568:2,4	million	593:5
635:19 636:5	671:12 737:1	600:7	misstate
637:19	Megyn	608:14,22	614:13
642:18 643:1	680:25		

June 27, 2022

mm-hm	706:25	need	641:5
580:2 613:12	morning	572:22 595:5	never
626:15	554:7,8	660:15	593:24
629:17 632:7	mother	665:16	597:11
637:2 648:8	603:20	695:19	635:11
675:15 691:3	motions	735:23	706:12
751:19 759:2	715:20	741:18 742:9	715:21
moment	motivated	744:13 746:2	720:9,14
575:4 662:15	607:15	needed	741:18
669:9 726:21	Move	555:4 572:14	news
Monday	749:5	606:22	682:10
548:25 552:9	moved	721:9,15	newsletter
568:7	555:3	743:15	721:12
money	moving	needs	Newtown
579:23	619:5	684:10	698:6
580:1,3	674:14,18	negative	night
581:1,5	675:2 677:4	676:16	736:22
613:13,14	multiple	748:4,6,7	non-
619:25	691:10	negotiate	disclosure
627:14 630:1	mutual	573:13 638:7	760:12,22
632:15	715:13	negotiated	nonetheless
633:23		647:6	722:11
634:22		negotiation	noon
639:15	N	642:22	737:9 738:22
653:14,16		647:10	Norm
672:2,9	name	negotiations	714:12
673:12	552:13 565:5	639:22	737:1,5,8
675:21	576:5 585:20	640:15	738:21
676:1,3,9	586:15	642:2,14,17	Norm's
691:25	589:15,19	neighs	617:19
694:24	647:20	654:20	normal
705:7,8	648:22 691:5	net	743:5
706:10,11,12	714:7	580:22	Notary
707:4,11	named	Network	548:24
712:2 742:10	559:4 732:18	549:17	553:17
752:24	names	551:14 714:8	notation
monies	589:18	723:3,13	555:14
644:12	narrow	724:14,24	note
662:23	654:8 678:11	725:5,13,21	566:4,15
759:18	697:4	726:1 727:18	599:13,22
month	nationwide	729:8,18	600:5,6,7,8
677:23	678:2 679:13	730:3,21	601:20
704:17,22,	nature	740:11,12	602:11,12,13
23,24	636:2 651:6	757:19	603:8
monthly	necessarily	758:1,24	607:21,22,
609:13,15,17	712:23	759:10	23,24 608:13
629:4 703:10	753:13	Nevada	609:5,14,23
704:22			

June 27, 2022

610:3,7,8, 12,17 611:5 612:25 622:13 635:5,15 636:22,23 637:13,16,20 638:16,17,21 639:5,7,11 640:6,21 641:1,8 644:5,7,17, 22,23,25 645:6,16,21 647:4 674:2, 22,23,24 676:15,17 690:25 693:12 696:1 702:25 756:3 761:24 notes 554:13,21,25 555:10,20, 22,23 556:10 557:3,7,8,20 565:23 566:10 568:10,15, 20,21,23,25 569:2,9,10, 13,15,18 570:10 599:16,24 600:2,22,24, 25 601:5 606:6 607:18 608:3,6 610:20,21 616:18 618:23 619:5 634:23,24 635:2,9 637:1,8,9, 12,24 640:20 672:6 673:11,17,20 674:5 676:21 690:25 691:8	694:11,13 696:1,4 704:19 714:5 726:18 731:10 732:9,13 747:11 notice 548:21 550:11 555:2 561:15 562:9 585:11 653:19,21 659:21 671:17 678:23 720:4 noticed 559:23 560:3 634:1 672:25 751:25 notwithstandi ng 722:11 740:19 November 566:15 599:22 606:10,11 607:14 611:15,23 612:18 614:1 615:5 616:13 644:23,25 645:6 646:10,14 674:10 676:20 677:1 689:1 690:6 731:12 npattis@ pattisandsmit h.com 549:14 number 604:17 607:20 609:20 610:2 623:13 651:3	662:9 664:16 666:25 667:6 672:8,12,15, 19,20 680:9 696:18 705:3 716:17,20 717:14,15 718:13,16, 19,21 719:9 723:25 724:1,4 737:24 759:15 numbered 565:25 numbers 561:15 604:22 619:25 644:14 655:16,17, 23,24 656:14 657:15 658:4,24 660:14,17 665:25 666:21 667:5 672:6 709:12 719:7,13,16, 17 724:8,12 numerous 724:1 nutritional 574:15 <hr/> O <hr/> oath 553:1 582:12 657:12 665:16,20 745:20 749:9 object 578:10 objection 716:21 719:4,11 720:17	721:5,21 722:4,18,23 723:4,20 724:10,16 726:2 727:11 739:17,21 740:24 741:5 742:3,19 744:20 745:5,14,15, 22 746:14 747:17,23 748:1,10,19 749:5,11,19 750:10,25 753:11,17 754:4,10 755:7 756:1, 8,13 757:1, 20 758:10,18 759:12,21 760:5,15,25 objections 550:11,16 554:1 obligations 608:11 observed 554:13 588:24 observing 551:10 obtain 557:13 obtained 555:17 556:5,14 557:3 735:2 obviously 574:6 593:14 595:8 636:13 642:7 653:10 655:18 660:13 700:7 709:16 750:4 occur 578:19,22
--	--	--	--

June 27, 2022

occurred	19 598:22	730:1,6	639:11 649:9
642:17	599:2 601:1,	731:18	667:10
706:20,22	17,21 602:22	733:16	670:20
709:9	603:10 605:1	734:7,18	674:2,3,7
occurring	607:6 610:9	736:10,15	678:22 679:7
578:8 706:23	611:7 617:3,	737:21	683:20
odd	9 619:23	738:18 739:6	685:17,18,
614:8	620:14 623:2	740:7 741:19	19,24 686:21
offer	624:19	743:14	687:14,18,
692:12	627:13	744:25	20,22,24
offered	629:18,19	746:12,13	695:3 703:22
715:21	630:14 631:9	750:7 751:17	704:2 711:18
offers	633:20	752:9 757:16	716:14
711:11,12	637:25	758:7,22	717:25
office	641:18,22	759:24	718:2,4
617:5,17,19	643:5,14,22	760:21 761:3	723:2,25
offices	644:22	on-boarding	729:2,11
548:21	648:12 649:2	744:9	731:11,21
official	651:18 652:9	once	735:6
550:5 643:20	655:5,13	581:25	736:11,12,16
oftentimes	656:25	585:23	737:11 738:4
642:9	657:20	681:18	739:11
okay	660:22	708:17 742:8	745:10
558:2 559:2,	662:1,4,16,	one	749:8,15,16
13,19 560:17	17 668:8	551:23	750:4,14
561:25 562:7	673:25	556:13	751:7,20
563:9 564:14	677:12 679:2	557:17	752:3
565:20 568:3	680:3,8	558:24	ones
569:7,19	684:11	560:3,8	561:11
570:3	686:20	561:4 562:19	562:10
571:13,18	688:1,8,24	563:4,18	602:24
572:10,25	691:17	567:15	636:13
573:9 575:18	692:18	570:23	695:23
576:7,11	694:10,17	571:10,25	725:16
577:20	695:15	594:13	ongoing
578:1,15	701:3,14,16	595:8,13	740:15
579:19	702:17,21	599:16	online
580:15	704:1	600:10	647:16 678:9
581:10,21	705:22,23	601:14	681:21 717:7
583:19	708:6,22	602:1,17,21	open
584:1,12,19	711:8,16	608:8 613:25	695:21
585:3 586:6,	712:10,25	614:2 618:7	733:24
16,24 589:9	714:25	621:7 625:25	761:10
590:3,21	715:10,12	626:12	open-ended
591:13,20	717:24 719:8	628:23,25	651:20
592:16	722:10,15	630:4,17	operate
594:12,22	723:8 724:6	632:24 633:5	726:5,6
595:7 596:1,	725:9,24	636:5,6,9,14	
	729:6,13		

June 27, 2022

operates 726:1	Orient 597:15	595:21 597:7,17	P
operating 690:20	origin 695:8 723:1	601:14,22 602:16	p.m. 652:16,17 710:18,19 736:13 762:7
operation 587:5 588:13 619:6	original 650:7,20	603:19,20, 22,23 604:2, 19 613:8	package 584:8
operational 621:1	originally 563:24	614:16 616:18	packaging 585:17 589:3,6,16 628:7
operations 585:14 621:4,11,14, 20	originated 691:22 696:19	618:21 619:2 620:17 632:16,19,24 633:9 644:1 648:19 726:13	pad 690:25
opinion 720:15 721:19 722:3,7,12	outcome 552:17	owner 633:1,11,15 642:5	page 641:9 646:23 648:7,8,9 680:17,18,25 687:20 691:14 695:1,2,4,9 697:8,11,12, 13,14,15 698:3 702:15,24 703:18,24 704:9 733:4
opinions 721:25	outlined 609:16 663:13	ownership 590:12,20,24 594:21 597:3 598:3 603:13 604:14 605:5,9,13, 23 612:13 615:21 619:17 643:13,18 726:15	pager 687:14
opposed 587:15	outlines 608:14	owns 575:22,23 576:9,10,14, 19 577:11 582:21 584:15,17 586:18 590:5 601:24 602:3,5 607:12 627:5,8 632:9,13 648:2,20 726:10,14	paggers 687:18
oral 742:18	outside 586:7 655:4 663:14 678:18 693:19 730:14 735:8		pages 687:22,25 695:14 696:3 697:13
Orange 549:13	owe 609:5 623:22 626:4,14		paid 560:4,5 563:10 572:4,13 573:17,18 606:23 607:1 612:12 613:14 615:6,9,14 619:5 625:4 632:5,6
order 551:23 583:24 585:23 586:19 589:4 591:23 605:19	owed 600:16 607:16 615:15 622:4 630:2 631:6 632:15 633:6 634:22 635:8 637:6 644:12 671:24 672:2,9,22 676:1,9 706:6,18 707:4,11,12		
orders 551:21 583:25 584:9,21	owes 581:1 639:15 673:13 675:22 705:7,8		
ordinary 619:16	owned 575:2 582:19		
Org 618:2			
organization 740:1			
organizational 643:19 647:15			

June 27, 2022

634:9,10	691:13	651:15 652:1	661:16
636:6 655:19	695:21	663:19	663:7,17,19
656:5,19	696:18,25	664:23	672:17
657:7,22	697:4,22	670:11	673:20
659:22	705:20 710:3	671:18 675:9	674:5,10,15
661:13	712:5 715:14	706:14 707:7	675:12
662:6,21,23,	717:12 728:9	712:1 743:11	676:19,21,25
25 663:13	735:14	payee	677:2 705:14
664:2,25	739:23,25	580:1	706:1,16
665:7	740:5 752:4	paying	727:8,9,14
667:20,21,24	parties	587:5 590:24	749:24 750:1
673:22	550:4,10,15,	606:19 613:1	752:3,6,16
674:16,19	20 552:16	618:22,24	753:1,9,16
707:5 710:11	553:25	619:8 624:14	755:9,13,17,
paper	562:21	625:2 628:18	20
625:6	563:10 642:9	631:5,17,21	pays
paperwork	651:15 746:7	632:10	579:23 581:6
643:19	747:6	633:5,17	586:18
Pappert	party	674:2	590:18 606:6
689:1,7	641:12	675:21,25	628:8,13
690:2	746:17	704:16	670:13
paragraph	747:22	743:11	703:10
640:25	passes	752:1,23	Paz
646:12	605:24	payment	548:20
681:19	past	607:9 609:22	551:19 552:8
paragraphs	728:8 744:11	610:17	554:7,24
555:15	749:22	619:15 620:1	561:21
part	750:17,19	637:5,6	562:12
557:2 595:10	751:5	646:16	566:3,14
597:25	Pattis	675:6,14	581:4 596:15
598:12	549:12	payments	616:7 618:4
601:25	559:4,15	566:11	623:18 639:8
603:19 613:6	565:10	580:20	640:23 649:9
624:17	573:25	593:17	652:21
632:1,18,19	714:12	606:8,13,15	656:11
633:10 662:8	733:6,10,20	607:14	665:16
730:3 742:18	pay	609:13,16,19	677:5,6,10
Participants	580:24 581:2	611:4,9,14,	679:22
552:3	590:10,11	16,23 612:2,	684:5,10
participate	591:5 606:17	5,6,9,20,21,	687:13
559:7	607:15 609:8	23 613:2,3,	688:21 691:2
participated	610:13	10 614:1,6	695:20
715:3	626:18	615:4	703:15
particular	627:15	616:13,17	710:23
644:5,7,24	628:1,19	618:6,25	712:13 714:7
647:10	632:25	620:2 635:3	717:10 731:8
664:16 666:7	634:21 635:7	644:17	733:5 736:12
686:21	645:7 646:3	651:23	738:12

June 27, 2022

743:22	642:5 644:2	personal	10 685:10
744:13	646:11 650:4	605:5 656:17	Planet
747:13	665:1 685:2	670:6,15,22	549:11
754:21	704:20 742:5	728:17	575:10
760:12 762:5	percentage	734:14	planned
Paz's	608:23	personality	734:20
690:25	632:22	741:9	planning
PC	Perfect	personally	597:25
548:22 549:3	715:12 716:3	604:3,13	598:1,12,13,
peer	period	642:3 647:6	17 599:7
658:21	564:13	personally--	742:13
pending	577:16 578:9	656:8	plant
576:17	579:8 580:9	pertained	678:10
761:10	581:13	563:5 644:7	platform
people	582:1,14,20	pertains	701:1 724:25
555:5 556:11	583:2,10,14	556:17	725:5,13
575:11 583:7	610:6 612:4	petition	727:2,16,20,
589:3,7,16	618:24	565:14	21 728:10,11
592:2,21	635:14	phone	729:4,20,21,
594:8 634:4	637:25	555:19,20	22
650:14 652:9	659:23	557:18	platforms
678:15,17	666:11	568:1,5,8,12	651:16
683:19,21	667:15	681:5 733:19	684:21
684:1,23,25	674:22	734:5 735:8	704:18
685:22 686:6	679:10 685:8	736:4	707:16 711:2
697:14,21,23	693:2 696:23	piece	play
698:14	697:22	585:9 631:2	736:6,11,16
700:3,21	705:18,19	646:11	738:4,13,18
702:10 704:5	706:23,25	739:11	played
713:1 717:5	712:4,7	place	737:15
724:4 740:3	751:24	557:22	playing
742:7,24	752:4,5	558:11	737:12
743:7 744:3,	periods	601:19	please
5 750:20	655:12,13	674:19	552:19
percent	person	places	558:20 574:4
595:20	559:16 565:5	575:20	596:12 609:2
597:3,8,17,	588:25	719:18	644:6 646:9,
18 603:19,21	689:11,14	plaintiff	23 680:19
604:2,3,9,	691:23 697:5	548:10	682:5 684:3
11,12,13,18,	699:17,23	552:25	688:19
19,20,22	701:18	plaintiff's	702:16
605:9 609:10	703:19	554:19	746:21
611:1 613:8	723:25	617:10,12	PLJR
614:16,17	735:6,9	738:1 739:4	595:19,20,21
616:18,19	741:11,15,18	plaintiffs	596:19
619:1,2,17	742:14	548:5,15	597:2,7,17,
620:16,18,23	751:16	549:2 551:8,	18 603:19
633:11,15			

June 27, 2022

604:2,8,12, 20 605:6 613:7 614:16 616:18,19 619:1 620:23 632:17 633:15 PLJR's 604:12 point 594:13 649:3,15 652:21 698:24 700:9 702:19 707:18 733:21 743:18 754:12,18 policies 731:23 732:1 poor 742:24 popular 697:12,14 698:2 portion 570:23,24 671:2,6 portions 670:23 position 556:8,10 560:19 561:1 655:10 678:8 700:20 705:11 717:2 720:6,8 possession 718:18,20 732:10 possibility 757:23 possible 596:6 713:21 possibly 678:3	post 556:7 599:21 701:22 702:1 post-2017 556:17 post-2018 556:7 posted 682:25 723:24 724:3 potential 662:20 667:9 686:4 715:18 potentially 678:16 power 713:24 PQ 628:24 PQPR 557:11 559:21 564:16 566:12,24 574:3,7,24 575:4,8,10, 15,19 576:3, 8,9,16 577:13,18,25 578:3,7,24 579:1,3,12, 16 580:24,25 581:1,2,16 583:5,6,7, 11,16,21 584:3,11,15, 20,23 585:1, 5,11,23 586:12,17,22 587:9,13,14, 21,22 588:2 589:11 590:5,16 591:14,19, 21,24 592:1, 6,8,11,12,13 593:4,10,12, 24 594:5,9,	14,15,21 595:4,14,21 596:24 597:3,16 598:3 600:16 601:14,23 602:5,16 603:13,18 604:9,12,14, 15,19 605:9, 24 606:6,14, 16 607:16 609:5 612:3, 7,9,14,20,24 613:6,10,14 614:7 616:17,18,19 618:22,24,25 619:7,10,16 620:3,10,24 621:1,4,11, 13,23 622:4, 11 623:22 624:10,12, 20,21 625:10,19,21 626:4,5,7, 13,19 627:11,15, 19,24 628:3, 5,8,12,19 629:1,7,22 630:1,9,11, 22,23 631:7, 15 632:16 633:10,15, 16,17 634:8, 21 635:7 636:4 637:4 638:7,13,25 639:15 640:17 641:4,13 643:7,12,16, 17,19 644:2, 12 645:7,8, 25 646:4 647:1,13,14, 17 648:19,25	671:24 672:3,9,23 673:19 674:20 675:5,22 676:1,3 691:22 692:7 695:5 702:25 703:10 704:16 705:5,7,8,13 706:1,6,8,14 707:4,10,11, 14,15,24 708:8,20 709:8,25 710:5,7,12 711:5,12,23 712:6,17,22 731:13,20 732:4,6,12 749:25 752:1,16 753:1 755:13,15 PQPR's 575:17 576:2 584:24 587:9 588:4 591:11 594:3 615:22 621:19 626:11,19 629:1 645:8 646:4 647:16 708:9 PQPR/FREE 708:25 practice 700:8 749:22 pre-2018 556:9 preparation 650:6,21 696:11 prepare 569:23 654:21 664:6
--	---	--	---

June 27, 2022

prepared 576:23 577:2,6 592:4 594:2 611:13 612:17 633:21 651:6 654:23 655:6 659:25 661:2,3 663:10 665:6 666:3,9,10, 12,16 667:2 668:6 669:4, 14 711:10 712:4 734:24 745:20	principal 599:9 607:24,25 608:14,20,22 609:10,14,22 printed 564:12 printing 589:5 prior 556:8 604:4 605:8 607:2 611:15,17, 19,22 619:4 624:24 635:5 638:3,8,14 639:6,23 640:17 646:3 676:20 704:4 715:8 735:11,12 741:9 755:22,23 758:1 759:6 760:4,11,17, 19,23,24 Prison 549:11 575:9 Pritika 549:8 551:12 732:24 privilege 550:16 probably 558:4 567:13 573:13 588:21 589:2 598:1 622:7 734:6 744:12 problem 582:5 734:12 problems 731:21 741:22 proceeding 552:4 proceedings	634:1 proceeds 577:17 578:23 579:9,11 580:7 581:11,14,24 process 584:10 586:13 593:19 730:17,23 731:3 744:9 processed 577:18 processes 583:5 585:19 processing 583:3 625:14 675:13 produce 686:21 690:22 695:1,9 produced 557:9,19 565:23 596:6 600:13 617:6 622:24 624:3,5 649:24 651:14 655:9 678:21 679:25 680:10 685:9 687:22 688:5 692:1 694:11 695:10 696:3,5 709:11,19 713:3 730:16,18 732:16 734:4 producer 679:9 producers 679:7	product 574:11,13,14 578:24,25 579:14 580:24 585:11,12 587:23 588:2 589:4 590:17 591:5 626:8, 9,14,19 627:24,25 628:8,12,14, 16,19 629:20 630:4 699:7, 19 701:20 705:8 production 720:11 727:5 734:9 761:11 products 574:15,24 575:5,17 576:9 577:13 579:14 581:3 583:22,24 584:4,5,15, 16 625:20, 21,22 626:2, 5,7,8,13,20 627:6,12,21 628:3,4,5,6, 7,9 629:2 630:23 631:5,16 645:8 652:1, 2 693:18 695:6 697:9 700:23 701:22 704:2,17 Professor 677:16 proffered 724:8 programming 689:19,23 690:9
---	--	--	--

June 27, 2022

programs 722:16 726:5 742:2	699:3,5 700:19	purported 606:19 610:12 611:14 619:15 635:14 639:23 644:7	704:13 715:17 739:7
progressively 674:17	published 680:25 681:13 687:19 697:20 701:13	purportedly 601:23 607:16 615:15 622:4 637:6	putting 589:6 597:13 676:10
promissory 566:4,15,23 610:12 641:1 673:11,17 674:4,22 731:10 732:13	pull 560:6 561:14 562:9,11 565:23 608:1 613:21 614:20,21 617:1 622:6, 20,22 623:10 672:17 677:9 714:4	purporting 557:9 644:11 712:15	<hr/> Q <hr/>
promoted 654:14	pulled 585:16 608:8 672:19	purports 600:15 623:22 643:9 663:16	qualified 756:19
prompted 568:15	pulling 585:11 589:4,5	purpose 568:8 574:10,14 594:4 598:11 599:5,7,8,11 607:17 608:10 652:22 689:8	Quantcast 719:16,19, 21,24,25
proof 550:5	purchase 574:11 575:11,17 591:7 626:19 627:11 648:16 689:19 691:24 697:9 699:12 700:23 701:20,22 704:6	purposes 654:10 685:24 708:24	quantify 691:21 694:24 699:8
properly 673:22 674:16	purchased 630:23 697:24 699:19 700:4	pursuant 548:21 553:2 608:12 609:14 752:20 753:10	question 560:16 561:8,20,23, 24 571:15 576:17 578:14 579:13,17,18 580:6,17 581:5 583:12,18 593:3 603:13 614:9,11 621:7 622:1 624:2 631:11,14 634:7 639:19 640:3 643:21 647:19 651:21 654:22 657:9 658:20 666:7 692:4,6 693:23 694:22 698:9 705:17,24 707:25 711:9 718:15,23 721:18 732:5 744:14,15, 17,24 745:7 746:21 748:12
proposal 692:12	purchases 576:3 625:21 626:7 674:15 695:13	purview 592:22	
provide 560:1 562:21 563:22 564:2,8 694:2 729:22 737:16 744:4	purchasing 625:21	put 558:21 598:16,19 599:8 602:20 635:2 656:16 674:18 679:20 681:21 685:17	
provided 565:11 567:12 658:16,17 661:4 667:21 669:25 670:12 671:11 695:23,24	purport 637:25		
provides 726:21,23 727:1			
public 548:24 553:17 684:23			
publication 692:8 694:4			

June 27, 2022

749:13	755:23 756:5	639:11	698:23
751:9,10	Raguso	640:25	711:7,24
752:7	549:24	650:20 662:2	715:8 718:14
754:16,18,	552:13	663:22	734:11
20,21 759:25	raised	680:4,5,6	receivable
questions	761:19	696:6 699:25	708:12
555:5	rate	703:3,6,21	receive
559:16,20,	572:9 608:23	716:11	567:3 572:16
23,24 560:3,	609:8,9,23	756:11,16,17	605:23,25
8 568:10	610:14	reading	617:18,20
581:10 672:5	646:10	550:21	705:25
677:4 688:23	711:5,6	663:23	received
702:21	713:6	ready	572:6,8
713:11	rated	713:12	619:16
714:11	683:14	738:19,20	654:19 662:8
716:7,9	rates	real	663:18
719:24 720:4	711:12	634:3	665:22 675:6
721:10	712:22 713:5	reality	679:1 681:24
726:19	ratings	657:5	706:2
729:12 731:5	682:12	realized	receives
747:1 754:15	re-cross	700:18	632:2
757:4 760:3	739:8	realm	receiving
761:5,8	re-direct	591:11	572:9,12
quick	743:16	realtime	585:10
588:14 649:7	re-directed	706:20	625:13
quicker	715:19	707:3,9	676:10
561:24	re-notice	708:18 709:9	recent
quickly	562:11	reason	565:14 571:8
672:17	re-paid	603:11	593:21
quite	636:8	624:15	658:4,7,14,
558:8 582:6	re-read	653:20	21 673:6
	570:20	683:23 684:2	recently
R	re-swear	687:2,4	690:1 744:11
	551:2	690:7	recess
racked	reach	709:10,22	616:2 652:16
634:13	684:24	718:16	710:19
radio	685:22	724:7,9	recollection
677:7 682:20	686:2,7	734:13	558:3,10
683:5,8,12	713:5 717:5	740:16,18	570:1,8
686:12,14	reaching	753:9	581:20
688:10,12	678:16	reasons	629:14
690:3	683:25 689:7	595:8 720:24	649:18
716:13,25	read	recall	record
717:3,13,15	553:24	582:3,7	552:2,7
722:16	570:9,15	590:15 595:6	615:25 616:5
723:19	571:22,23	622:2	617:3 621:18
725:12,21,25	627:16	649:19,22	652:14,19
726:7 741:9		696:13	710:17,21

June 27, 2022

736:6 737:17	referral	613:10,14	565:2 566:11
739:7 761:25	715:22	614:6 674:5	576:24
762:3	referred	715:25	577:3,7
recorded	562:3	760:13	591:4 592:5
552:4,5,7	622:16,21	regularly	593:19
707:2	647:17 672:1	720:20	630:18 652:4
708:11,19,21	716:2 732:17	721:2,3	664:19
recording	referring	Reiland	673:18
672:22,24	559:20	549:15	689:10 727:8
691:18	560:13 562:2	551:17,18,25	728:14 729:5
736:20	570:21 598:7	553:4 554:3	732:1,11
738:6,16,21	599:18	559:5 567:13	740:12,15,
records	608:2,20	578:10	17,20
584:24 591:1	616:23 618:4	614:22	relationships
recruit	622:9,15,23	616:25	650:23
685:25 686:4	623:1,6,17	617:4,22	651:3,7,8,
rectify	648:24	652:10,13	10,16,19
731:22	660:24	695:16,18	728:8 729:1
redirect	678:13	712:10,18	relevant
743:17,20	680:24	713:17	761:21
756:2 757:3	681:19	732:16 734:9	reliability
redirected	693:15	735:24	720:16
648:13	refers	737:18,21	721:20,25
reduce	557:8 693:11	748:1	722:1
741:19	reflected	754:10,17	reliable
748:17	557:13	755:1 761:8	722:3
reduced	644:10	related	relied
731:23,24	697:19	552:15	722:21
739:12,15	705:12	561:11	rely
740:22 741:3	reflecting	620:12,22	753:22
744:5,6	605:13 676:9	692:9 694:25	relying
750:5 757:15	reflects	695:11	670:3
reduces	680:21	696:20	remaindermen
754:13	refresh	697:19	598:16
refer	570:1,8	698:10	605:20
690:11	629:13	699:3,18	remember
692:24	649:18	700:3,12,19,	555:25 558:5
715:25	regarding	22 702:11	586:14,15
reference	559:16 620:9	741:7	588:20
667:4	639:22	relating	589:13,15,20
referenced	651:16	562:4 695:3	596:14
746:11	657:15	relation	605:16
references	660:25	692:8 694:3	629:9,12
667:5	672:12	relations	649:16,17,22
referencing	679:18 746:6	684:14	670:24 671:9
601:3	747:5	relationship	672:7,14
	regular	559:21	679:9 696:5
	612:5	564:21,22	698:24

June 27, 2022

705:3,7	representation	662:11,14	670:7,22,23
714:21	683:24	respective	returns
718:6,9	representative	550:4,10,15,20	670:18
remote	572:5 638:11	responding	671:1,6
552:25	651:5 669:21	603:12	reveal
remotely	671:16	response	761:20
549:7,21	758:15 759:8	640:2 679:1	revenue
552:23	representatives	730:20 747:1	698:9 699:2
rent	638:12	760:2 761:6	700:18,21
590:16,24	represented	responsible	702:9,12
591:6	641:15	577:22	review
rental	642:9,14	587:13	557:5 570:25
590:16	663:1,7	625:13 626:5	649:13
rents	668:12	689:15	650:21 684:9
584:17 590:6	representing	rest	688:22
reorienting	690:2 741:25	555:5	709:16
672:3	represents	restructuring	reviewed
repayment	655:11	597:24	556:21
635:4	republished	result	570:4,11
repeat	682:3	598:25 604:8	571:3 591:1
578:16	request	612:13	599:1 623:3
583:12	552:6	615:15,21	624:4
report	require	630:22	650:18,19
622:22	674:5	653:15	655:3,24
reported	required	654:25 693:6	668:6,13
662:23 681:3	573:6,8	694:25 699:3	670:17 688:7
717:13	592:4 595:9	700:18	709:15
reporter	760:22	resulting	731:11
551:1,4,20	requires	622:12	732:13
552:18,21	659:21	resume	reviewing
553:20	requiring	685:23	569:20
737:23	675:5,8	retain	649:19
Reporters	Research	711:18	ride
680:6	553:13	retained	588:10,15
reporting	reserved	586:7 698:23	right
688:11	550:17	retainer	553:24
reports	553:24	573:24 574:1	554:16
672:1 682:16	reserving	retaining	555:19
746:1	554:1	676:2	556:14,18
represent	resources	retains	564:7,9
551:14	587:13	620:23	568:17,23
576:12 585:1	728:15	retargeting	569:12
586:8,22	respect	721:11	572:19
592:1 621:14	582:25	return	573:11,19
647:14 661:9		656:23	576:25
679:25 688:4		657:2,5	577:1,9
708:3 714:8			578:20,21
			579:21,22,23

June 27, 2022

581:10	640:12,14,	709:2,4	569:22
582:22	18,22 641:6,	711:14,20,23	587:17
583:23	13,25 644:3,	712:23	591:2,18
584:1,5,24	19 645:9,13	713:6,24	602:2,10,16
585:7,25	646:5 647:8,	714:13,16,20	604:24
586:9 587:7	25 648:2,3,	715:1,4,15,	611:11
588:14,17,	4,5,14,17,23	23 716:16	622:25
20,22 589:9,	649:12	724:12	635:20,23
12 591:2	650:7,18	729:15	638:19,24
592:7 594:6,	651:18,24	732:3,14	658:9,12,14,
17 595:24	652:7 654:21	733:7 734:5	19 659:2
596:2 599:3,	656:18	736:4,16	660:4 661:3
20,22,23	658:3,6	737:8	664:7 668:2,
600:12,17	659:3,11	738:11,22	4,12 669:10
601:7,8,12,	660:2,6,10	748:9	671:4,14
15 602:5,13,	661:20	752:17,19	673:14
15,18	662:10,13	753:6	691:8,11,19
603:14,15,24	663:3,9,21,	756:23,25	692:6
604:10	22 664:11,	759:20 761:9	693:14,19,25
605:7,11,20,	14,17,18	right-hand	694:1 698:21
25 606:12	665:3,18,21	691:14	705:17
608:7,25	666:13,18	ring	707:18
609:11,12	667:4,6,11,	653:3	709:15
610:15,21	12 668:1,17,	RMR	710:24
611:16,20	19,22 669:1,	548:23	711:18
612:1,8,11,	12,18,23	Rob	712:14
12,15 613:6,	670:5 674:3,	571:3 649:20	731:15
24 614:20	5,6,8,12,25	650:1,3,6	role
615:8 616:7	675:18,24	Robert	684:12 685:3
617:25	676:4,5,20	684:6	689:4
618:2,23	678:3,20	Roddy	room
620:6,17	681:21	555:6,14,17	551:17 553:5
621:16,21	682:1,4,14,	556:5,14,20	554:4
624:22	18,23 683:1,	557:4	round
625:12	2,21 685:15	569:10,20	631:12
626:9,16,23	686:14	590:1 694:9,	routed
627:15,16,	687:7,8,9,10	18,19 696:17	578:23
19,25 628:4,	688:25	697:18 698:8	580:3,7
16 629:3,12	689:21,24	704:15 720:5	581:14,16,17
630:1,2,6,	692:10	755:10	582:15
11,14,24	693:20,21	Roddy's	run
631:3,8,18,	694:5,21	569:21 570:5	593:10
19 632:4,6,	696:24	Roe	742:11
13 633:5,7,	697:3,13	555:8 557:18	running
8,19,24	698:20	560:21	569:9
635:19	700:13,15	562:23	600:19,21
636:22	701:6,7,8,10	566:21,22	runs
637:11	704:4 706:3,	567:9,19,21	575:14
639:16	13 708:9,10		

June 27, 2022

635:22	700:3,12,19,	693:4,14	Scott
694:19	22 701:13	698:5 701:23	684:6
741:17	702:7,10	702:1	screen
	738:7	703:21,24	580:12
S	sat	704:22	733:5,8,9
	570:21	scheduled	735:20 738:5
sake	571:11	557:23	scroll
697:5	satellites	558:7,8	562:17,19
salary	730:4	733:15	564:17
661:15,22	satisfactory	school	608:15 609:9
662:7,15,20	694:2	598:18,23	641:8 646:9,
667:11	Save	714:13	20,22 679:21
668:15,21	653:17	Schwartz	684:10
Salazar	654:15	555:8	685:11
698:5	Saveinfowars	557:16,21	686:19
sale	653:3	558:11	733:3,21
579:20 580:7	savvy	559:4,9	735:18
581:11,24	736:2	560:13,24	search
582:12	saying	561:4 562:2,	564:1,10
584:15	556:16	22,24 563:2,	695:12
585:11 628:6	590:23	4,12,17,21	second
695:8 699:7	612:16	564:4,19	558:24
sales	616:14	565:21	570:16,24
577:13,17,23	626:13,16	566:9,18	576:17
578:4,18,22,	628:3 629:21	567:25	580:21
23,24,25	638:16,18	568:1,14,22	595:13,22
579:10,11,14	639:10,17	569:13,16,22	598:20
580:24,25	675:23	591:3 608:3	599:15,18,25
582:1 583:22	678:18	611:11	600:10
587:23 588:2	681:23	622:25	607:24
626:8,9	683:14	638:19	618:11
629:21 630:5	699:5,23	639:13,25	625:25
647:17	716:12 746:9	640:6 658:10	627:1,22
691:15,21	says	659:4,6,8,13	636:22,23,24
692:7,11,23,	556:18,19	660:4 672:16	637:16
25 693:5,7,	557:2 597:4,	673:15	644:22
8,17 694:24	11 604:7	752:12,14	648:19 649:9
696:18,23	638:2 639:11	755:10	661:21
Sandy	643:10	Schwartz's	673:23
677:18,23	657:17,18,19	565:13	674:21,23,24
691:25	659:24	scientific	706:7 709:5
692:8,10	666:13 678:4	716:20	736:11
694:25	680:22	scientificall	737:11,14
695:4,11	681:15,22	y	738:13
696:20,24	682:2,4,7,19	723:18	seconds
697:6,19	683:6,9,11,	scope	735:21
698:10	16 690:4	743:18	section
699:3,18,21	692:15	745:15 756:2	555:12

June 27, 2022

562:15	626:7 628:4	670:12,14,15	shopping
714:18	send	726:22 727:1	651:24
755:18	580:1 627:11	759:18	short
secured	711:20 734:8	Seshadri	568:12 569:5
641:12	737:18	549:8 551:12	685:23
see	sending	554:18 566:1	732:21
551:11	624:13,21	617:8,24	shorter
567:17 569:1	685:16	623:15	646:15
570:23	689:14	737:25	shots
590:14,17,	707:10,14	set	733:8
18,25 591:9	sense	554:13	show
592:24	664:23 675:3	609:23	600:15
596:22,23,25	688:8 734:22	610:17	617:24
597:1 610:22	739:13	652:22	653:11
616:21 623:5	749:23	653:5,7,8	677:8,17
629:20 641:7	752:22,24	654:9 655:8	679:8,13
643:6 645:19	753:3 759:19	663:11 712:6	680:2,14
649:6,18	sentence	several	682:8,18
654:8 663:14	692:14,19	635:13	686:1,5,6,
677:11,20	separate	677:17	12,14 687:1
678:18	585:7,8	718:23	690:2 696:7
680:9,20,23	587:22	745:16	697:2 725:1,
681:9 682:7	592:3,23	share	2 726:10,13
683:14	593:16	644:2 720:15	727:3 748:13
684:8,10	606:25	sheet	showed
687:13 688:9	635:22	685:18,19,24	585:15,16
689:15 691:4	661:18	686:21	586:12
702:24	669:13 704:8	705:10	588:25
703:14	September	Shelton	589:14
704:3,5	596:24	553:13	596:14
710:5 715:19	sequence	shelves	600:19 671:1
733:5,23	554:15	589:5	696:18
736:7,8,12	737:16	SHERLACH	697:18 698:8
742:9,10	series	548:9,14	710:3 711:18
761:12	569:21	shifted	712:14
seeing	735:14	685:7	747:14
590:16	serve	shipment	showing
696:13 711:7	671:15	585:12	617:23 686:1
segments	service	shipped	711:21
570:14	562:21	585:18	shown
sell	563:11	shipping	670:19,22,24
652:1	726:21	585:12	671:5 696:2,
selling	727:21	shoot	22
626:6 628:1,	services	713:19	shows
12	555:16 556:4	shooting	613:19 680:6
sells	563:6,20,23	677:24	697:3 724:20
574:13,15	564:6		725:1,12,19
575:4 584:5			729:22,23

June 27, 2022

side 636:6 691:14 695:4 743:1	sits 582:8	solicited 653:11 654:15	591:17 592:19 593:2 595:5 624:2 639:2 672:11,18 688:3 692:2, 17 695:2 698:11,16 702:13 711:5 712:22 744:18 745:3,11,19 751:16 753:20 755:20
sign 553:25 642:5,6,7 643:9,16,17 647:13 744:8	sitting 622:2 629:25	soliciting 652:22 654:10	
signature 641:24 646:22	situation 593:12,14 632:23 739:24	some-odd 605:9	
signed 574:1 637:12 641:20 643:6 674:24	situations 593:15	sort 557:10 573:24 692:22 718:23 732:5	
signers 641:8	size 679:18 682:9 716:7,25 717:22 718:3,13,24 719:2 723:14,17, 19,24 756:6, 24	sound 727:5	
significant 673:14	sketch 614:19	sounds 565:2 665:5	specifically 559:21 560:23 561:3 562:1,24 568:8 572:17 587:20 605:18 613:24 622:23 629:14 672:9,14 687:23 709:12 732:1 741:7 746:16 751:13
signing 550:21	SMITH 549:12	soup 594:24 595:20	spectrum 682:12
signs 641:12 646:17,18 647:1	smoothly 635:22	source 613:25 614:2 619:11 630:4 631:6	speculate 618:9
similar 647:4 688:10	social 700:3,9,22 701:12,19 728:21	sources 619:12 667:9,13,17, 23 668:14 669:5,8,13, 16,18	speculating 639:8
similarly 730:20 758:23	software 585:19	South 641:3	speculation 639:20
simply 656:10 660:4 675:20 705:14 751:2	sold 574:12,24 575:1,7 576:9 579:14 626:20,24 627:2,6 628:17 695:6 704:3 709:8	space 590:6,16 591:6,7,11, 12	Speech 549:10 555:7,9 557:10 559:12,22 560:5,20 561:7,12 563:11,22 564:16,20,22 565:2,5
single 743:24 744:17 745:3 748:21	sole 615:20 616:8 619:20 741:17	speak 555:4 559:16 573:1 650:3 659:6 679:17	
sit 582:11 591:9 616:11 638:10 656:6 698:25 711:9 728:1 758:15	solely 607:15 641:23 668:2	speaking 561:3 569:20 656:2 658:9 680:21	
site 575:11 647:20,23		specific 559:25 564:11	

June 27, 2022

566:11,23	20,23 628:1,	675:5,21,25	745:2,12,19
572:4 573:25	8,9,13,18,	676:2,7,19	746:17
574:3,12	22,25 629:5,	677:7 678:1,	747:2,15,21
575:2,5,13,	7,22 630:2,	21 679:11,18	748:17
19,22,23	8,11,20	680:11,13	749:10,25
576:8,13,19,	631:4,5,7,	681:24 682:3	750:8,15
23 577:2,6,	12,15,16,20	683:23	751:6,14,21
10,11,12,18,	632:2,13	684:12	752:1,15
21 578:3	633:11,17,	685:14	753:1,21
579:1,3	21,22 634:4,	686:10,11,23	755:13
580:23	8,12,20,21	687:6	757:7,12,18
581:1,15,17,	635:6,7	688:11,15	758:1,4,9,
22 582:8,11,	636:3 637:3,	689:2,17,19	16,23 759:10
15,18,22	5 638:6,10,	690:5,15,20	760:4,9,14,
583:2,9,15	13 639:1,15,	692:1,8	21
584:14 585:4	21 640:2,14,	698:22 699:1	Speech's
586:1,8,21,	16 641:2,10,	700:2,7,17,	584:6 607:13
25 587:4,10,	15,21 642:1,	20 701:12,17	668:5 670:21
15,22 588:3,	6,12,13,16,	702:9,11	671:7 705:11
11,12 589:10	21,24 643:15	704:16,17	speed
590:7,18,23	644:12,15,	705:5,7,8,9,	593:18
591:23	16,24 645:6,	13,25 706:6,	spending
592:5,12	23 646:7,18	9,14,17,19	740:4
593:4,23	647:6,22	707:3,4,14,	spent
594:1,9,14	648:2 650:2,	15 708:1,4,	740:3 742:15
596:19	13,16,22	7,12,16,18,	spoke
600:16	651:2,5	25 709:7,8,	555:6,19
606:6,14,16,	652:3,21	18,24 710:7	561:15 591:2
18 607:7,8,	653:10,14,	711:1,10,22	599:2 602:9
12,15,19	16,25 654:6,	712:5,16	638:19
608:9,11	9,18,23	718:2 719:2	679:19 694:9
609:4 610:11	655:6,10,18	720:2 721:2,	703:17
611:4,13	656:2,3,10,	19 722:2	709:11 710:2
612:3,4,6,	20 657:1,7,	723:12	spoken
17,19,23	11 660:8	724:24 725:4	556:21
613:2,9	662:22	726:10,12,	560:21
615:15	663:24	13,21,25	635:11,12
616:17	665:7,21,22	727:9,15,18,	735:6
618:15,18,	666:5	22,25 728:9	spreadsheet
21,22 619:7,	667:10,14,	729:7,16	560:9 564:3,
11,13 620:3	20,21,24	730:11,14	5 574:4
621:9,18,22	668:14,20,	731:12,13,	581:7,8,9,
622:5,11,16	23,24 669:7,	20,22,25	10,19 582:4
623:21	16,19,20,22	732:4,6,10,	600:13
624:9,13,21	670:11,13	12,17 739:19	613:17,19
625:1,5,11,	671:2,24	740:11	622:9,10,23
14,19 626:4,	672:3,21	741:8,13,25	623:17,24
10,11,18,21	673:19	743:10,23,25	629:15
627:15,18,	674:4,9,19	744:19	

June 27, 2022

630:8,15	611:4,9	Sterling	Street
636:20	622:5,8	549:7 551:9	549:13,18
644:11	626:2 628:24	stick	552:14
655:3,4,8	631:13	701:15	strike
658:16,17	658:12	stipulate	578:5 653:15
660:24 661:2	672:21 673:1	552:22 553:9	670:9 686:9
662:6 663:15	698:21	STIPULATED	725:3 740:9
667:8 668:7	737:12	550:3,9,14,	749:5
669:24 670:2	738:10,15	19	structure
705:2,9,12,	745:10	stipulations	597:21 598:3
21 707:20,21	started	553:21,23	603:13
708:23,24	592:11	stock	619:17 634:3
709:12 710:4	603:11	585:15	635:3 647:15
711:7,15,17,	606:7,8	742:11	734:23 740:1
21 712:6,14,	614:6 623:22	Stockmal	741:13,23
22	624:1 625:18	548:23	746:1 747:6
spreadsheets	630:21	552:19	structures
557:19 560:7	631:11	553:17	727:8
561:5,6,9,	635:15	stop	studio
10,11,17	644:16 673:7	608:25 609:2	588:13
562:1,4,20,	675:5 676:25	631:21 658:6	stuff
25 563:4,13	737:12	744:13	579:2 735:9
578:25	starting	stopped	736:22
600:5,19	676:15	625:3 650:17	738:24
601:2 622:6,	680:20	732:25	subject
8 627:17	starts	stops	761:16,17,18
629:14	557:8	625:2	subjects
651:14	State	storable	671:16
658:11	548:1,24	574:18,19,23	678:23
690:11,12,23	553:18	575:1	submission
713:2	statements	store	625:7
spring	620:22	584:7 700:4,	submitted
654:1,6	stations	23 701:20,22	718:12
squiggly	678:2,13,14	702:5 703:22	subscribe
691:4	679:13	704:2,5	631:24
staff	684:20	stored	subscribing
584:7,20	685:21	584:16	687:3 724:12
stake	688:13	stores	Subsection
604:9,11	717:3,13,16	628:6	608:21
stamp	725:25	story	subsequent
685:13	726:4,7	702:4	683:1
standard	stations'	strategies	subsequently
722:22	717:4	720:10,14	699:12
standards	status	streams	subsidiary
756:21	560:25	682:22	622:17,18,20
start	650:1,9,12	683:17	substance
554:12	staying		568:18 692:7
567:15 596:1	628:2		

June 27, 2022

substantial	578:17	695:22	607:7,9,15,
739:15	580:5,10	698:14	19 609:4
sufficiency	582:21 589:1	700:11	611:4,13
550:11	592:17	702:22 703:8	612:7,17
suggesting	593:2,16,20	704:14,20	613:9 615:15
618:4 672:2	596:10	707:20 711:6	618:15,21
Suite	600:1,11	712:9,13	619:11
553:13 641:4	602:25	713:8 716:8	621:18,22
sum	603:7,9,18	723:10	622:5 623:21
729:24,25	604:1 606:23	725:16,17	624:9,22
summarize	607:1 609:1,	730:5 731:15	625:1,5,11,
712:11	15 611:1,3,8	734:16,19	14,19 626:4,
summarized	614:15	735:2 746:22	12,18,21
571:6,16	616:21	749:4 758:13	627:15,20,23
687:15	617:1,19	surprise	628:1,13,18
summary	618:14	741:1	629:5,8
580:13 623:6	619:12	surprising	630:2,8
684:21	621:17	740:21	631:5,6,7,
685:20,23	622:19	swear	13,16,17,21
Sunday	624:15,25	552:20,22	632:2,13
558:18	626:1,3	sworn	633:12,17,
682:8,14,24,	627:7 633:25	553:7,16	21,22 634:8,
25 683:4	635:21,25	synopsis	20,21 635:6,
716:12	636:7 640:12	728:4	7 637:4,5
736:12	644:19	System's	638:6,13
SUPERIOR	647:20,23	563:23	639:1,15,21,
548:1	648:12,20	systems	22 640:14,16
supplements	649:10	549:11	641:2,10,15
574:16	650:4,10	557:11	642:12,13,
support	651:20	559:22	16,21,24
552:19	652:6,24	560:20 561:7	643:15
715:22	655:20	564:20 565:2	644:12,16,24
suppose	656:21	573:25	645:6 646:7,
761:6,20	658:13	575:2,13,22	19 648:2
supposed	660:16,19	576:13,19,23	650:2,13,22
693:5	661:25	577:2,6,10,	651:2 652:3,
sure	662:3,10,11	11,12,18	4,21 653:10,
551:4 555:1	664:22	581:15,18	14,16 654:1,
558:9,14	665:1,4,18,	582:8,11,15,	6,9,18,23
560:17	24 666:2,23	18,22 586:8,	655:6,18
561:22	668:22	21,25 587:4,	656:2,10,20
562:23 563:1	673:7,21	10 590:7,23	657:1,7,11
564:17,23,25	674:15	591:24	660:8 663:24
567:22	675:8,11	592:6,12	665:7,21,23
573:12	676:24	594:1,14	666:5
574:19	685:2,6,7	596:19	667:10,14,
576:6,15,20	686:3,8	600:16	20,22
	692:15,21	606:16,18	668:15,20,24
	693:3,13		669:22

June 27, 2022

670:11	745:2,12,20		573:15 678:7
671:24	746:17		696:16 698:4
672:3,21	747:2,15,21	T	751:18
673:19	748:17	table	talkers.com
674:4,9,19	749:10	596:22	686:21 687:3
675:5,21,25	750:8,15	take	talking
676:2,19	751:6,14,21	555:22	560:23
677:7 678:2,	752:1,15	557:22	568:24
22 679:11,18	753:21	568:20 581:9	575:13
680:11,13	755:14	585:9 590:22	580:21
681:24 682:3	757:7,13,18	593:9 605:4	588:21
683:23	758:1,4,9,	614:22,24,25	603:11
684:13	16,23 759:11	615:24	612:6,9
685:14,22	760:9,14,21	619:10,13	636:19
686:10,11,	Systems'	621:9 624:7	637:10 639:5
23,24 687:6	561:12 572:5	647:4 649:7	656:8 672:15
688:11,15	574:3 575:5,	652:8 662:5	681:16
689:2,17,19	19 576:8	664:10 674:1	682:14,23,24
690:5,15,20	577:21 578:3	677:12 684:9	683:18
698:22	581:23	687:15	693:13,16
700:2,8,17,	583:3,9,15	688:21	696:24 697:1
20 701:12,17	584:14 585:4	700:19 701:2	699:7 700:6
702:10,11	586:1 587:15	702:18 707:1	702:9 704:14
704:16,18	588:4 589:10	712:20	705:19
705:13,25	608:9,11	715:20	731:25 732:1
706:6,9,14,	610:11	736:23	734:12
18 707:4,14,	618:18	738:24	741:12
16 708:1,5,	619:13 621:9	taken	talks
25 709:8,24	628:22,25	548:21 550:7	608:21 697:2
710:7 711:1,	630:20	552:8 558:11	tax
10,22 712:5,	634:12 640:2	568:21	656:23
16 718:2	642:1 644:15	653:14,16	657:1,5
719:2 720:2	645:23 656:3	695:5	663:11,17,19
721:2,19	668:23	takes	664:1,2,15,
722:2 723:12	669:20 671:2	573:3	23,24,25
724:24 725:4	692:8 699:1	taking	665:2 670:7,
726:11,12,	706:19	589:4 737:6	12,17 671:1,
13,22 727:1,	708:7,16	talk	5
10,15,18,22,	709:7,18	560:19 588:6	taxes
25 728:9	732:17 753:1	594:21 637:1	656:17
729:7,17	760:4	640:20	662:24
730:15	Systems's	698:13	663:12 671:5
731:12,13,	622:16 636:3	714:10	technicalitie
20,25 732:4,	638:11 651:5	716:5,7	s
6,10,12	655:10 707:3	729:9 736:24	550:5
739:19	708:12,18	742:7	technological
740:11	730:12	talked	ly
743:23,25		571:25	736:2
744:19			

June 27, 2022

Ted	646:13,15	664:4 665:6,	704:4,15
723:13	724:15,18,19	9,16 666:4,	706:19
727:9,22,25	740:8	9,10,12,19	708:7,16
728:2,8,18,	terms	668:20	709:7,18
20 729:10	607:21	669:4,14	712:20 747:4
730:10,22	619:25	672:10	753:22
Ted's	642:18 647:7	678:22	754:12
728:14	695:12	711:11 712:4	Texas
Tel	719:23 720:9	734:20 735:3	570:18
549:4,14,19	727:4,8	748:4 749:9	572:5,21
telephone	testified	754:14 755:5	573:5 586:8
569:22	553:19	testifying	595:2 596:6
694:14	571:20 572:3	561:18 587:9	602:2 641:2,
735:17	575:4 578:18	618:15 656:4	4,6 670:20
telephonic	583:21 590:5	665:20 670:3	671:5
569:3	595:2 616:7	testimony	694:15,16
tell	626:12 632:3	569:8 571:1,	696:11,12
562:10	651:2 665:11	4,7,16	733:14
587:20 599:5	671:25	572:17,21	text
601:14	672:11	575:19 576:8	649:20
603:17 608:9	678:19	577:21	713:19
613:18 614:6	710:23	578:3,7	732:15,18,24
630:13	743:22	581:23	733:3,5,21
636:18	745:1,20	582:18	735:15,20
638:5,24	746:25 747:3	584:14	texted
639:24	751:24 760:2	585:10	733:12 734:1
644:23	testify	589:10	texts
651:1,11	560:11	590:22 593:9	649:22
658:19	573:5,10	605:4	thank
659:4,8	576:24	607:13,16	551:20 559:6
665:19,21	577:3,7,11	610:11	572:2
673:16	582:12	613:13	582:17,24
697:10	592:5,7	618:18	597:20 614:3
699:17 702:5	595:9,10	619:14 620:9	621:7 622:14
703:12	611:14	621:9 623:20	631:10
720:20	612:17	628:22,25	640:19
723:23	621:13	630:20	692:19 716:4
726:25	628:21 630:8	634:12 642:1	721:16 737:5
738:19 741:2	637:23	644:15	746:23 762:1
743:7 749:18	638:11	645:23 647:5	Thanks
753:4,8	651:6,22	649:19 656:3	739:1
755:11	654:24	661:22	theme
ten	655:2,7,23	662:19	741:24
569:6 588:10	656:7,13	668:23	thereof
593:3,23	657:6,12,15,	669:11	740:1
670:25	19,21 658:1	671:23 672:4	thing
term	659:22,25	676:18	553:9 560:12
610:7,8	662:7 663:10	697:17 699:1	628:17

June 27, 2022

659:14,16	637:13	714:2,3	688:16
674:3,7	638:1,3	718:8	689:25
742:21	646:8 647:19	three	693:10
747:11	650:3,17,20	556:13 559:8	696:11,23
757:11	653:18	565:15	697:22 698:4
things	656:13,15	683:13	701:4 704:21
579:2 585:1	664:24	698:13	705:18,19
628:23 629:1	665:14	three-way	706:23,24
630:24 631:1	666:22	734:15	707:8 709:21
649:6 673:9	671:4,18	thrown	710:15,18,21
674:1 689:12	672:7,11	611:25	712:5,7
707:23 716:6	679:19	Tim	720:11
719:15	687:10,13	589:24,25	722:12
721:12 735:5	691:20	650:12,16	726:19
741:19 744:9	693:16	652:5	733:24
think	695:10	time	740:2,4
551:3 555:3,	697:9,15	550:17	741:20,24
8,19 556:7,9	698:4,11,16	551:24	742:15,21
564:18	699:8 704:20	552:9,10,18	750:18
567:9,11	707:6,7	554:2 555:23	751:24
569:18	710:11 713:9	556:2 564:13	752:4,5
570:9,19,24	716:2 720:25	577:16 580:9	timely
572:15,22,24	724:5,18,19,	582:6,20	674:19
573:2,8	20 730:18	583:10,14	675:6,12,22
574:1 575:24	734:12,13	588:18 589:8	times
577:24	739:23 740:6	596:15,17	635:13
578:11	743:5,6,10	597:2,7,9,	677:17
582:3,18	744:10	15,23 600:19	718:24
587:16,19	745:25	601:18 606:9	719:21
588:9 589:19	753:3,5	610:6 612:4	720:13 724:1
591:17	757:22	614:25	755:5
592:14,18,19	758:20	616:1,5	title
593:13,21,22	760:10	618:24	643:20
594:6 595:19	third	624:10	titled
596:2,3,17	562:20	625:17	623:9 664:15
597:24	563:10	633:14	today
598:5,8	651:14	635:14	551:10
601:13,24	714:24 746:6	637:10,25	554:12 555:3
602:1,24	third-party	643:23,25	558:16
604:6 605:14	563:6 628:14	652:15,19	560:11
607:2,11,21	651:4,23,25	655:12,13	562:11 568:7
613:7,19	710:8 711:12	658:21	569:24 570:6
614:19	712:23 744:6	667:14 676:1	572:18,24
616:24	746:11	678:7 679:10	573:2,18
622:8,21,24	thought	683:4,25	576:24
623:9	555:4 558:15	684:13	577:3,7
624:16,17	626:24 627:2	685:7,8	582:9,11
636:12	713:17	686:10,11	597:6 607:13

June 27, 2022

611:13	702:24	transacted	true
612:18	708:1,4	577:13,17	573:10
616:11	topic	transacting	656:22
630:20	562:15	577:22	663:23
638:10	651:12 677:5	transaction	717:17
649:14	697:4 698:15	574:4 582:13	720:25
650:20,21	710:3	622:11,21	trust
654:24	topics	641:16	595:21,24
656:3,6	677:6 697:3	642:3,8,17,	598:5,7,8,9,
663:10	698:13	22 672:1	11,15,17
665:6,19,21	total	705:12	599:6,9,12,
666:3	604:17	transactions	13,14,17
694:12,13	610:20	564:13,15	600:3,9
696:6 702:2	661:8,10,11,	577:25	601:10,15,
711:10	23 663:1	578:4,8,18	19,22,25
716:6,12	664:25	579:4,7	602:1,3,6,
724:8,15	665:6,10,22,	580:14	10,11 603:2,
732:13	25 666:4,14,	581:24	4,6,12,15,23
738:24	19 667:20	582:25	605:6,7,10,
745:20	668:15	583:4,5,21	21 606:1,2
756:12	681:13 693:7	590:14,16	611:21
761:12	702:9,12	591:8 599:24	612:10,13,25
today's	totaling	623:7 672:20	613:4,5,8,
552:9 762:4	693:8	709:1	15,18,25
told	totally	transacts	614:5,8,16
564:23 565:6	594:12	577:25	615:3,11,14,
587:11	tour	transcribed	19,21,23
590:4,6,13	584:9 585:14	555:24	616:9,12,15,
591:14	586:3	transcript	16,20 618:5,
592:18	toured	551:21	8,19 619:2,
601:22	588:7	680:1,7,14,	9,18 620:1,
602:16	town	20 716:14	4,5,11,13,
605:18 622:2	686:19	transcription	20,22,25
623:25	track	563:20 564:6	621:25 644:1
659:2,16	596:2 695:7	transcripts	trust's
664:7 668:2	702:1,8	570:5 680:5	602:17
696:17	Tracy	756:16,17	605:23
704:15	677:16 678:1	transfer	trustee
752:25	718:5,7,10	603:2 605:13	621:25
Tom	723:1,6,7	transferred	trusts
689:1	traffic	605:5	598:18
tomorrow	704:3	transmitter	try
734:17	trail	725:21	589:21
736:21	554:2	trial	601:14
top	training	550:17	613:21
629:9 636:12	598:23	573:5,11	645:18
644:6 648:7			673:12
653:2 690:10			691:25

June 27, 2022

721:17	731:8,10,15,	understand	744:18,22
753:19	17 732:2,12	555:15 558:9	745:2,4,8,9,
trying	740:13,20	565:1 578:13	11,21
601:9 614:4,	747:11	594:12 596:4	746:10,16
9 649:5	758:25	598:25 601:9	747:2,16,20
673:7 689:9	type	612:21	748:8,16
691:20	555:22	613:5,9,25	749:9 750:9,
692:10	590:20	614:4 623:20	15,23 751:4,
729:14	689:11	627:24	6,8,14,21
738:12	719:22	628:10	752:21,25
tune	typed	638:18	753:7,10,14,
682:13	555:25 556:1	639:17 642:8	20 754:22
683:19 684:1	types	657:20	updating
turn	651:18	660:11,13,14	707:11,12
619:2 692:4	684:25	661:9 663:16	USA
TV	typewritten	675:19	689:18 690:8
549:11	554:13,20	681:12 706:5	usual
twice	696:4	708:21,22	553:21,22
570:21		720:24	
two	U	744:23 746:9	V
555:15		758:13	
556:13	U.S.	understanding	Vagueness
557:18	552:14	559:9 565:13	745:22
564:16	Uh-huh	571:20 574:9	valuation
565:23	640:24	580:16	596:12,15,
566:10 567:3	UHY	586:17	19,23
568:9 570:14	596:11,18	591:21	value
571:11,12	ultimately	607:17	706:15
582:25 585:8	579:3 585:18	608:10	variety
590:15	620:7,20	609:21	721:11
593:17	626:10,21	619:19	various
600:22,24	627:6 628:7	662:18	651:15
606:17,25	630:25 633:4	676:14	729:23
608:6 610:20	642:18	697:17 698:1	vast
617:5 618:7	691:21,24	717:18 720:1	731:23
630:19 634:2	unable	741:3,8	vendors
635:17 639:3	699:2	understood	651:4
644:14 650:8	unaware	567:2 628:2,	Verbatim
651:2 661:11	667:16	3 660:20	583:2
667:9,16	760:21	712:21	verify
668:13	unclear	734:23	650:11 735:5
669:1,6,13	681:16	undertakes	versa
670:21 671:8	unconscious	608:11	752:2
673:5,11,17	634:18	unpaid	version
688:6 702:21	unconsciously	630:22	681:7
703:3,22,24	634:16	636:15,16	versus
714:23		unwritten	552:11 636:7
716:13 724:5		743:23,25	

June 27, 2022

695:23	visibility	629:11	693:14, 22
vice	700:9	631:13	694:23
752:2	visit	637:1, 22	697:4, 10, 16
video	627:8, 9	638:5, 8	699:8, 16
552:7	voice	639:19, 20	701:17
557:16, 17	734:1, 4, 10	640:4, 20	702:4, 12
680:24 681:6	735:19	643:18	707:23
682:1 701:12	VOLUME	651:12 664:3	712:15
702:3	548:3	677:4, 6, 8, 12	715:14, 19
723:16, 17,	voluntarily	686:5, 17	717:6 721:7,
19, 24 724:2,	561:18	697:6 700:25	17 724:13
3 732:25		703:6 714:10	750:3
videographer		716:5, 6	website
549:24	W	730:7 734:15	574:12
552:1, 13		735:1 736:6	575:9, 11, 16,
615:25 616:4	W-2	737:12, 18	17, 25 576:2,
652:14, 18	661:15, 18, 22	739:7	4, 6, 13, 18,
710:17, 20	662:15, 20	750:12, 14	21, 25 577:4,
762:3	665:10, 12, 24	755:5	5, 8, 9 584:6,
videos	666:21	wanted	7 626:21
681:9, 13, 15,	667:10	570:7 617:21	627:8, 9, 11
16, 17, 21, 24	668:21	676:14	647:17, 18, 22
716:15	Wadsworth	685:17 721:9	648:14, 19, 25
756:16	549:18	734:16, 19	652:22
videotaped	wages	736:24	653:1, 3
548:20	661:20	warehouse	654:15 695:5
view	wait	584:8, 9, 16	697:5, 7
723:25	562:18	585:15	698:15
viewed	576:17	586:3, 18, 23	699:24 702:7
681:6 724:4	651:13	587:5 588:7	703:11 704:8
viewership	703:18 750:6	590:4, 6, 8,	707:22
719:23	waived	10, 20, 25	websites
views	550:7, 12, 22	591:10	575:2, 5, 6
681:6, 7, 8, 9,	want	742:10	576:9, 10
13, 16, 17, 19,	551:1 556:12	watch	577:14, 17, 23
20, 25 683:1	558:9 561:2,	627:16	579:3, 8, 21
723:25 724:2	19 564:17, 25	WATERBURY	580:8 582:19
Viktoria	571:23	548:2	583:1 627:4,
548:23	580:10	waves	5, 7 717:4
552:18	581:22	678:10	week
553:17	592:25	way	557:9, 25
virtually	593:5, 8, 22	571:7 583:20	558:1, 4, 17
571:12	594:8 595:23	638:7, 11	565:24
virtue	596:16	647:11	567:7, 12, 19,
557:4 604:11	598:20, 25	648:10	21, 22, 23
vis-a-vis	614:13, 18, 20	654:7, 25	568:5, 6
723:17	618:9, 13, 14	656:16	569:3 589:7
	621:3 625:16	692:7, 11, 14	681:21, 24

June 27, 2022

682:17	737:10	758:25	X06-uw-y-cv18-
683:7,13,20	738:8,18	workings	6046437-s
684:1 735:13	739:2,22	592:8	548:11
weekday	740:25 741:6	works	X06-uw-y-cv18-
682:9	742:4,20	585:21	6046438-s
weekend	744:21	594:14 644:4	548:16
570:7,12	745:6,17,24	worth	
weeks	746:2,4	636:16	y
557:23,24	747:18,24	wrap	
558:16	748:3,11	615:1 649:6	yeah
571:12 651:2	749:12,20	729:14	558:5,20
went	750:11	write	578:13
555:1 570:7	753:12	569:4	583:13 601:4
581:25	754:5,11,19	writing	609:18 610:1
586:4,11	756:9,14	635:2 731:24	614:24 621:5
693:24 694:7	757:21	739:12,16	626:22
701:4 702:5	758:11,19	740:23	630:16
714:12 735:9	759:13,22	741:4,19	636:18
741:20	760:6,16	744:5	637:15
whichever	761:1	747:11,12	642:20
684:20	wonder	748:18 750:5	650:18
who've	713:15	757:15	652:11 664:1
594:9	word	758:21	667:4 672:5
WILLIAM	569:9 624:18	759:17	676:23
548:9,14	631:24	written	702:20
wing	675:20	573:24 641:1	703:18
705:19	words	731:13,14,	736:5,9
withhold	665:19	16,17 732:11	737:20
633:22	691:23 751:2	742:17 746:6	760:18
witness	work	747:7,14	year
551:2	555:9 572:4	748:13,14,15	606:9 607:4
552:20,22	573:14	749:2 751:3	611:12,18
553:6,15,24	585:14	757:6,13,24,	622:11
578:12 596:9	591:22	25 759:5	644:21
646:24	592:10,13	760:8,10	645:11,19,21
649:3,10	594:4,11	wrong	654:1,20
652:11	670:18	614:15	655:21
702:18,22	673:17	wrote	656:14
710:14	698:9,19,21	556:3	657:16
713:14	730:3		660:15
716:22	worked		663:18
719:5,12	594:9,13	X	664:10,12
720:18 721:6	working	X06-uw-y-cv18-	667:7
722:5,19,24	559:11	6046436-s	676:12,13,16
723:5,21	564:20	548:6	690:1 693:13
724:11,17	594:9,15		698:6 714:24
726:3 727:12	732:25		715:9 749:25
735:25	743:9,10		750:4

June 27, 2022

years 593:3,23 598:1,2 610:8,14 611:1 625:24 660:9 661:15 662:12 663:6 665:8,23 666:5,15,20 667:10 670:21,24,25 671:8,9,10 676:4 709:14,20 714:23 715:4 719:3 740:17 759:15 years' 709:13 yellow 690:25 yes/no 721:23 York 552:15 Youtube 682:25 700:4,5 724:2 Yup 702:22 709:6 <hr/> Z <hr/> Zach 553:3 567:11 596:7 712:9 Zachary 549:15 551:18 553:4 Zapada- hernandez 708:4 zero 645:14,19 676:14,16	Zimmerman 704:11 zone 552:10 Zoom 551:8,12 558:22 559:3 568:2,4,24, 25 569:15,21 618:2	
--	--	--